

# **EPA Registration Number 11195-1 Vol 5**

# PESTICIDE PRODUCT REREGISTRATION

## LIST OF SUPPORTING DOCUMENTS

**PRODUCT NAME:** The Fruit Doctor / Compressed Sulfur Dioxide

**COMPANY NAME:** Snowden Enterprises, Inc.

**EPA REGISTRATION NUMBER:** 11195-1

	DATE
<b>NOTICE OF PESTICIDE REREGISTRATION:</b>	
<b>REREGISTRATION ELIGIBILITY DECISION:</b> Sulfur Dioxide EPA-HQ-OPP-2006-0335; Amendment dated 4/25/2007	May 2007
<b>LABEL:</b> (Pin punched 7/3/2008)	
<b>CSF:</b> Basic Alternate	6/25/2008
<b>FORMULATOR'S EXEMPTION:</b>	NA
<b>DATA MATRIX:</b>	
<b>CERTIFICATION WITH RESPECT TO CITATION OF DATA:</b>	
<b>PRB LABEL REVIEW:</b> DP356589	11/12/2008
<b>ACUTE TOXICITY REVIEW:</b> DP351266	4/16/2008
<b>PRODUCT CHEMISTRY REVIEW:</b> DP355348	8/27/2008
<b>OTHER:</b> HED evaluation of CDPR comments: DP370450	1/20/2010
CDPR – Sulfur dioxide use in wineries: respiratory protection requirements	5/28/2009
CDPR – Enforcement CAC Letter 2009-12: Sulfur Dioxide Use in Wineries	5/28/2009
CDPR – Winery Use of Sulfur Dioxide	6/2009
CDPR – Microbial Pest Control Study Guide – Chapter 8: Sanitizing Wooden Wine Barrels and Wine Bottle Corks	Printed from internet 4/5/2012





Pest Management Solutions  
for Specialty Crops and  
Minor Uses

IR-4 Headquarters  
Center for Specialty Crop Pest Management  
Rutgers, The State University of New Jersey  
500 College Road East, Suite 201 W  
Princeton, NJ 08540  
732-932-9575 fax: 609-514-2612  
[www.ir4.rutgers.edu](http://www.ir4.rutgers.edu)

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February 10, 2017

Rachel Holloman  
Lisa Pahel  
US EPA OPP  
2777 S. Crystal Drive  
Arlington, VA 22202

Dear Rachel and Lisa:

**RE:** Submission PP# 6E8511 (Sulfur Dioxide/Fig, MRID 500043-01)

As per 40 CFR 180.8, we withdraw the above petition without prejudice.

Yours very truly,

Interregional Research Project No. 4

Per 

Kathryn Homa  
Fungicides Coordinator  
IR-4 Project Headquarters  
Rutgers, The State University of New Jersey  
500 College Road East, Suite 201 W  
Princeton, NJ 08540

Cc:(All via email)

Jerry Baron, Susan Bierbrunner, Debbie Carpenter, A. Ertman, Matt Hengel, Dan Kunkel,  
Ken Samoil, Van Starner, Ann Tillman, IR-4 Regional Field Coordinators

*Major funding for IR-4 is provided by Special Research Grants and Hatch Act Funds from USDA-NIFA,  
in cooperation with the State Agricultural Experimental Stations and USDA-ARS.*

**Pahel, Lisa**

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**From:** Ann Tillman <Ann@PyxisRC.com>  
**Sent:** Thursday, February 09, 2017 5:37 PM  
**To:** Pahel, Lisa  
**Cc:** Holloman, Rachel; Ertman, AWillis  
**Subject:** Re: Sulfur dioxide IR-4 Petition

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Lisa,

I sent IR-4 an email on withdrawing the petition and you should be hearing from Debbie Carpenter. The decision is really IR-4's to make. Snowden didn't make any submission with the petition, merely supported the IR-4 petition.

*Ann*  
Ann M. Tillman  
Pyxis Regulatory Consulting, Inc.  
4110 136th St. NW  
Gig Harbor, WA 98832  
(253) 853-7369

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**From:** Pahel, Lisa <Pahel.Lisa@epa.gov>  
**Sent:** Thursday, February 9, 2017 3:34 PM  
**To:** Ann Tillman  
**Cc:** Holloman, Rachel; Ertman, AWillis  
**Subject:** Sulfur dioxide IR-4 Petition

Hi Ann,

Thanks for talking to us earlier. To clarify-if Snowden chooses to withdraw this action, IR-4 will also need to withdraw their petition #6E8511. Please let us know if you would like us to contact IR-4.

Best,  
Lisa

Lisa Pahel  
Environmental Protection Specialist  
Fungicide and Herbicide Branch  
Registration Division  
Office of Pesticide Programs  
703-347-0459



Explore Registrations

Reg Number: 11195-1      Reg. Type: Product Registration - Section 3      Status: Conditionally Registered (17-Jul-199)

Name: THE FRUIT DOCTOR/COMPRESSED SULFUR DIOXIDE      <View Registration Details>

(No New Receipts)

S:	Submission Type	OPP Rec'd Date	Resubmission	Description
<div> <div> ...Decisions... <ul style="list-style-type: none"> <li>D: Pending; 520896; 11195-1;W04;IR-4 (100%);</li> <li>D: Pending; 520895; 11195-1;R170;NEW USE;EACH</li> <li>75-Day Letters</li> <li><b>S: 991179 8/26/2016; Amendment; 11195</b></li> <li>D: Closed; 515258; 11195-1;300;LABEL REVISION;N</li> <li>D: Closed; 514594; 11195-1;300;LABEL REVISION;N</li> <li>D: Closed; 508113; 11195-1;300;LABEL REVISION;N</li> <li>D: Closed; 471800; 11195-1;332;NOTIFICATION;</li> <li>D: Closed; 421602; 11195-1;360;ACTION INITIATED</li> <li>D: Closed; 391277; 11195-1;300;LABEL REVISION;N</li> <li>D: Pending; 386248; 11195-1;676;Product Reregistrati</li> <li>D: Closed; 347801; 11195-1;300;LABEL REVISION;N</li> <li>D: Closed; 347728; 11195-1;W01;ULTRA SMALL BUS</li> <li>D: Closed; 347005; 11195-1;V12;FEE REDUCTION (1</li> <li>D: Closed; 290220; 11195-1;R17;NEW USE;EACH AL</li> <li>D: Closed; 290219; 11195-1;350;GENERAL CORRES</li> <li>D: Pending; 290218; 11195-1;320;DATA REQUIRED;L</li> <li>D: Closed; 290217; 11195-1;160;NEW REGISTRATIC</li> <li>Data Requirements</li> </ul> </div> <div> S: 991179      Reg #: 11195-1  Submission Type: Amendment  Resubmission?: <input type="radio"/> Yes <input checked="" type="radio"/> No      E-Sub #:  Decision #: 520895; R170;NEW USE;EACH ADDITIONAL NEW FOOD US  Submitter Company: SNOWDEN ENTERPRISES, INC  Application Date: 18-Aug-2016  OPP Received Date: 26-Aug-2016      Date Sent to Risk manager: 31-Aug-2016  Studies Included?: <input type="radio"/> Yes <input checked="" type="radio"/> No      Fast Track?: <input type="radio"/> Yes <input checked="" type="radio"/> No  Form A Signed?: <input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> None      Date:  Form B Signed?: <input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> None      Date:  Reviewer: Pahel, Lisa  Received DT:      Editable Due DT:  Submission Due DT: 18-Dec-2017      Response: 0, 26-Aug-2016  Priority Weight:      Priority Points:  Comments: IR-4 project has received a request from the state of CA for the clearance of sulfur dioxide in or on fig as a post-harvest treatment for the control of aspergillus mold, botrytis fruit rot </div> </div>				

9/9/16 et

- 90 day screen-fail → 10 day letter (screen due date 1/3)  
 • how does this work w/ Reg Review?

• rejection letter - does it fit these circs or generic?  
 ✓ ✓ w/ PRD that nothing received/extended  
 • ✓ w/ Brin - send draft letter

PRD - studies in? Did other regs submit?

Ann 253-853-7369

email: IR-4 has to withdraw petition #, let us know if we  
 (Ann withdrawing 11195-1) should contact IR-4



September 29, 2016

Erik,

This is a Section 3 label amendment that was submitted with an IR-4 petition (PP#6E8511) for use of Sulfur dioxide on fig.

The Section 3 amendments associated with this petition are:

R170 for Fig - EPA Reg # 11195-1, D520895.

Copies of the labels submitted with this petition can be found in Documentum as follows:

11195-1, submission # 991179

The Minor Use Team (MUT) will send data into review for this petition to HED for the human health risk assessments and request that HED complete the 90 day screen. The MUT will also send a request to EFED for the drinking water estimates. The PMs have agreed that the Product Management Team will send the section 3 label amendments into review to EFED to conduct the ecological risk assessment and will request EFED complete the 90 day screen.

For your information, the residue data can be found in Documentum under the petition number PP#6E8511 or submission number 991186. The following data were submitted:

Magnitude of the Residue on Fig

MRID 500043-01

Andy Ertman has been assigned this action on the MUT. Andy will schedule the first team meeting. As per your e-mail, I have requested that you and Lisa Pahel be invited to the meeting.

I have requested a docket for this action - the Docket Number is EPA-HQ-OPP-2016-0587. I requested that you and Lisa have rights to docket. I ask that PM team use this docket to process the Notice Pesticide Products; Registration Applications (NOR) for this action.

Please let me know if you need any additional information.

Thanks  
Barbara  
305-6463



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

August 31, 2016

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

OPP Decision Number: D-520895  
EPA File Symbol or Registration Number: 11195-1  
Product Name: THE FRUIT DOCTOR/COMPRESSED SULFUR DIOXIDE  
EPA Receipt Date: 26-Aug-2016  
EPA Company Number: 11195  
Company Name: SNOWDEN ENTERPRISES, INC

ANN M. TILLMAN  
PYXIS REGULATORY CONSULTING, INC.  
AGENT FOR SNOWDEN ENTERPRISES, INC  
4110 136TH STREET CT NW  
GIG HARBOR, WA 98332-

SUBJECT: Receipt of Amendment and IR-4 Fee Waiver Request

Dear Registrant:

The Office of Pesticide Programs has received your application for amendment and IR-4 fee waiver request. If you submitted data with this application, the results of the PRN-2011-3 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R170

NEW USE;EACH ADDITIONAL NEW FOOD USE;

Your request for waiver has been forwarded for review. You will be notified in writing when a determination is made regarding your request. If the determination indicates that payment is due, you will receive instructions for submitting payment at that time.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman, at (703) 308-9362.

Sincerely,

A handwritten signature in black ink, appearing to be "m. j. [unclear]".

Front End Processing Staff  
Information Technology & Resources Management Division



# Receipt for Section 3

S: 991179

Milestone Email: homa@aesop.rutgers.edu

Regulatory Type: Product Registration - Section 3

Resubmission: ☐ Yes ☒ No

Print Letter

Application Type: Amendment

Fee For Service: ☒ Yes ☐ No

Enter More Information

Billable: ☒ Yes ☐ No

Tracking

Company: 11195 SNOWDEN ENTERPRISES, INC

V

Risk Manager: Registration Division, Risk Management Team 24

Product #: 11195-1 Product Name: THE FRUIT DOCTOR/COMPRESSED SULFUF

Override#:

Me Too

Me Too Product

Section3:

Name:

Application Date: 18-Aug-2016



OPP Rec'd Date: 26-Aug-2016



Front End Date: 29-Aug-2016



Risk Manager Send Date:



FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐

New Ingredient: ☐

Receipt Description:

Portal submission pkg. #13650. Amendment to establish tolerance on figs.

New Ingredient

Request Date:

New Ingredient

Received Date:

Form A: ☐

Signature Date:

Form B: ☐

Signature Date:

Receipt Content

De

Electronic Label

View/Edit

DOCUMENTUM



PRIA Bi-Weekly 1/11/2017  
**Sulfur Dioxide**

- Background:
  - IR-4 petition to add use of sulfur dioxide on fig received by OPP 8/26/2016
  - Registrant is Snowden Enterprises, Inc. represented by Pyxis Regulatory Consulting, Inc.
  - PRIA date 12/18/2017
- 10-day letter deficiencies, letter sent 12/21/2016:
  - **Storage stability:** From submitted data: it is not possible to discern if residues on figs are stable for the field trial storage durations since both tested intervals resulted in LOD residue levels
  - **Residue analytical method:** The petitioner should analyze the samples using a data collection method capable of achieving a lower limit of validation of 10 PPM (recommended tolerance level for figs)
  - **Proposed tolerance:** Petitioner proposed a tolerance of 25 ppm, it is unclear whether this is appropriate since resulting residues from field trial data were all less than the LOD.
  - **Toxicology:** Relevant, published toxicology studies are needed to summarize why these data are sufficient for endpoint selection.
  - **Occupational Exposure studies:** Sulfur Dioxide DCI required the following two studies, which have not been received by the Agency:
    - Inhalation Exposure Study for Applicators (875.1400)
    - Post-Application Inhalation Exposure Study (875.2500)
- Company response 1/9:
  - **Residue analytical method and storage and stability:** Sent additional information on storage stability and residue analytical method directly to HED
  - **Toxicology:** MRIDs associated with these summaries were included on data matrix submitted with this petition
  - **Occupational Exposure studies:** Company has submitted an extension of submission due date for DCI and expects preliminary results to be available this spring
- EPA evaluation of response:
  - **Storage stability:** Per HED email, company's response did not fulfill storage stability requirement
  - **Residue analytical response:** per HED method reported does not meet EPA or OECD criteria for enforcement criteria for an enforcement method
  - **Toxicology:** HED still reviewing response
  - **Occupational Exposure studies:** PRD determining if extension request received/path forward

→ reject if deficiencies not addressed by response to 10 day letter  
• waiting for HED to finish their review

NID = not in Documentum

Sulfur Dioxide: DCI 077601-1491 (1/10/17)

7 Studies Requested in DCI - not evaluated

1) Honeybee Acute Vapor Exposure, Avian Acute Inhalation Toxicity with Bobwhite Quail, - in Documentum  
Vegetative Vigor Vapor Phase: Submitted as one study *MRID forthcoming*

2) 860.1500 Crop Field Trial Grapes (Magnitude of the Residue in Plants: Grapes)

*8 in Documentum*  
a. 17 Studies: 41630601 (NID), 41275702, 41275701, 41074502, 41074501, 40695613,  
40695612, 40695611, 40695610 (NID), 40695609 (NID), 40695608 (NID), 40695607  
(NID), 40695606 (NID), 40695605 (NID), 40695603, 40695602 (NID), 40695601 (NID)

IR-4

3) 875.1400: Nothing submitted \* 10 day letter

4) 875.1700: Product Use Information. Snowden provided MRID 498042401, however NID *HED data matrix*

5) 875.2500: Inhalation Exposure: Nothing Submitted \* 10 day letter

*not Subd  
noted as  
rejected in  
Documentum*

\*NID = Nothing in Documentum



4110 136TH ST CT NW  
GIG HARBOR, WA 98332  
T: (253) 853-7369  
F: (253) 853-5516  
ANN@PYXISRC.COM

January 6, 2017

OVERNIGHT DELIVERY

Michael Goodis, Acting Director  
Registration Division  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202

Dear Mr. Goodis,

RE: Snowden Enterprises, Inc.  
OPP Decision Number 520895  
The Fruit Doctor/Compressed Sulfur Dioxide, EPA Reg. No. 11195-1  
Response to Agency Letter dated December 21, 2016

On behalf of Snowden Enterprises, Inc. I am responding to the Agency letter dated Dec. 21, 2016 regarding the data deficiencies for the cited product and the IR-4 tolerance pesticide petition for figs.

**Residue Chemistry (Storage Stability, Residue Analytical Method and Proposed Tolerances):** IR-4 has responded directly to Will Donovan, EPA, with additional information on the Storage Stability and Residue Analytical Method questions. Mr. Donovan was to respond to IR-4 if additional details are required to support this petition. *Per will method not acceptable to enforce fig tolerance + SS not adequately demonstrated, need method capable of achieving LOD of 10ppm for fig*

**Toxicology:** The requested toxicology data were not required in a DCI. However, Snowden Enterprises, Inc. submitted these data as part of registration review. The MRIDs associated with these summaries (49944401-49944409) were included on the data matrix that was submitted with the IR-4 petition.

**Occupational Exposure Studies (Inhalation Exposure for Applicators; Post-Application Inhalation):** Snowden Enterprises, Inc. has submitted a request to EPA for an extension for submission of these data. Snowden has a meeting scheduled with the testing facility in January to discuss these studies. Preliminary results will be available sometime this spring.

Please feel free to contact me ((253) 853-7369, [Ann@PyxisRC.com](mailto:Ann@PyxisRC.com)) if you have any questions or need any additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Ann M. Tillman".

Ann M. Tillman





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

OPP Decision Number: 520895  
EPA File Symbols: 11195-1  
Product Name: The Fruit Doctor/Compressed Sulfur Dioxide  
EPA Receipt Date: 08/18/2016  
EPA Company Number: 11195  
Company Name: Snowden Enterprises, Inc.

December 21, 2016

Ann M. Tillman  
Agent for Snowden Enterprises, Inc.  
Snowden Enterprises, Inc.  
c/o Pyxis Regulatory Consulting, Inc.  
4110 136<sup>th</sup> St. Ct. NW  
Gig Harbor, WA 98332

Dear Ms. Tillman:

The Agency has completed its preliminary technical screening of your application pursuant to Section 33(f)(4)(B)(i)(II) of the Federal Insecticide, Fungicide, and Rodenticide (FIFRA) Act, as amended by the Pesticide Registration Improvement Extension Act. The Agency has determined that your application has not passed the preliminary technical screen and therefore is subject to rejection if the application is not corrected.

HED has completed the 90-day technical screen for sulfur dioxide. Several issues were identified with respect to the residue chemistry data submitted. Data requirements identified during the scoping phase of Registration Review for this chemical have not been satisfied with the submissions for this petition.

Residue Chemistry

Storage Stability (860.1380)

Freezer storage stability data were generated concurrently with the fig field trial study (MRID 50004301). Fig samples were fumigated with sulfur dioxide at 250 ppm-hr (a 10X treatment rate), stored frozen, and analyzed at 1 and 15 days after treatment. Residue levels were at the method limit of detection (LOD) for both the 1-day and 15-day storage interval. It is not possible to clearly discern if residues on figs are stable for the field trial storage durations since both tested intervals resulted in LOD residue levels. The petitioner should provide information confirming that sulfur dioxide residues in figs are stable over the 19-day frozen storage duration in the field trials. It is suggested that, in order to obtain measurable residues in figs, untreated fig

samples should be fortified with a known (and adequately high) amount of sodium sulfite standard prior to frozen storage and analysis.

Residue Analytical Method (860.1340)

Although the data collection method used in the fig field trial study (MRID 50004301) is an FDA enforcement method, it did not yield good results. Concurrent fortification recoveries were low and variable at 25 ppm (the stated lower limit of method validation, LLMV) and 50 ppm. Only at 100 ppm did results meet expected performance criteria for an enforcement method. The calculated LOD and limit of quantitation (LOQ) are 10.3 and 30.9 ppm, respectively. The study report notes that method sensitivity was limited by matrix effects and analyte loss may have occurred during sample processing. The petitioner should analyze the samples using a data collection method that is capable of achieving a lower limit of validation of 10 ppm, which is the recommended tolerance level for residues of sulfur dioxide on figs.

Proposed Tolerances (860.1550)

The petitioner has proposed a 25 ppm tolerance level for residues of sulfur dioxide in figs based on the results of the fig field trial study. It is unclear whether this level is appropriate given that the resulting residues from the field trials were all less than the LOD. In addition, the current FDA requirement is to list sulfite concentrations in excess of 10 ppm (expressed as SO<sub>2</sub>) on ingredient labels in order to protect sulfite sensitive individuals.

### Toxicology

For sulfur dioxide, HED recommended in the scoping document for Registration Review<sup>1</sup> that registrants submit relevant, published toxicity studies and present a compelling weight-of-evidence rationale summarizing why use of the data from these studies will suffice for endpoint selection to determine risks from exposure to sulfur dioxide gas through inhalation. These published articles were not submitted to HED with this petition.

### Occupational Exposure

There is potential for occupational applicator inhalation exposure to sulfur dioxide during fumigation, and there is potential for occupational post-application inhalation exposure to sulfur dioxide in/on the fumigated commodities. This exposure may be short- and intermediate-term in duration for workers. No worker exposure data were submitted to the Agency providing applicator and/or post-application exposures to sulfur dioxide resulting from the use of sulfur dioxide on figs. Therefore, there are insufficient data currently available to complete an assessment for the use of sulfur dioxide on figs; worker applicator and post-application exposure data are required. These data were required during the scoping phase of registration review for sulfur dioxide<sup>1</sup>, and were identified in the Data Call-In (DCI) for the inorganic sulfites as a data gap:

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<sup>1</sup> Memo, Negrón-Encarnación *et al.*, D411060, 9/11/13

Inhalation Exposure Study for Applicators (875.1400)

These studies are required to assess exposures for applicators involved in fumigating commodities/materials and/or structural facilities.

Post-Application Inhalation Exposure Study (875.2500)

This study is required to assess post-application exposures for workers near fumigation facilities/operations or who work directly with previously treated commodities/materials.

In order for the review of your product to continue, you will need to correct your application to address the item(s) listed above within 10 business days of the date you received this letter. Corrections must be received by EPA by the 10<sup>th</sup> business day. EPA recommends sending your complete set of corrections by email to the contact listed below to ensure they are timely received. If studies or confidential information are being submitted by mail, a complete courtesy copy received by email by the deadline will be considered timely. If you cannot correct the application [or do not respond] within 10 business days, your application will be rejected.

At this time, you could also choose to withdraw your application. If you have questions, please contact Lisa Pahel at [lisapahel@gmail.com](mailto:lisapahel@gmail.com) or (703) 347-0459.

Sincerely,



for

Michael Goodis, Acting Director  
Registration Division (7505P)  
Office of Pesticide Programs





United States  
Environmental Protection Agency  
Washington, DC 20460

☐ Registration  
☒ Amendment  
☐ Other

OPP Identifier Number

**Application for Pesticide - Section I**

1. Company/Product Number Snowden Enterprises, Inc./11195-1	2. EPA Product Manager H. Garvie	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Snowden Enterprises, Inc./The Fruit Doctor/Compressed Sulfur Dioxide	PM# 24	
5. Name and Address of Applicant (Include ZIP Code) Snowden Enterprises, Inc. c/o Pyxis Regulatory Consulting Inc. 4110 136th St. Ct. NW Gig Harbor, WA 98332 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

**Section - II**

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

**Explanation:** Use additional page(s) if necessary. (For section I and Section II.)

PRIA Fee Category: None (Tolerance Petition and Amendments are being submitted by IR-4)  
REGFEE Not applicable. IR-4 petition and amendment to establish tolerance on figs

**Section - III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	
				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

**Section - IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Ann M. Tillman		Title Agent		Telephone No. (Include Area Code) (253) 853-7369	
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature 		3. Title Agent			
4. Typed Name Ann M. Tillman		5. Date Aug. 18, 2016			



IR-4 Project Headquarters  
Rutgers, The State University of New Jersey  
500 College Road East, Suite 201W  
Princeton, NJ 08540  
732.932.9575 fax: 609-514-2612  
www.ir4.rutgers.edu

Pest Management  
Solutions for Specialty  
Crops and Minor Uses

August 26, 2016

Ms. Barbara Madden  
1 Potomac Yard  
2777 Crystal Drive  
Arlington, VA 22202

Dear Ms. Madden:

**RE:** Sulfur Dioxide  
**The Fruit Doctor EPA Reg. No.: 11195-1**  
Sulfur Dioxide (determined as (SO<sub>2</sub>))

Commodity or Crop Group	IR-4 PR No.*	Support for Tolerance Proposal
Fig	<b>10114</b>	Volume 2

\*PR numbers in **bold** have data volumes in this submission

Category: R170 \$66,124

The undersigned, Mr. Kenneth S. Samoil, Technical Coordinator, Interregional Research Project No. 4, State Agricultural Experiment Station, Rutgers, The State University of New Jersey, 500 College Road East, Suite 201W, Princeton, NJ, 08540, on behalf of the IR-4 Project and the Agricultural Experiment Station of California submits this petition pursuant to Section 408(e) of the Federal Food, Drug and Cosmetic Act, as amended, with respect to the pesticide chemical, Sulfur Dioxide (40 CFR 180.444). We request that this petition be reviewed under the Pesticide Registration Improvement Act and that EPA should exempt the registration fee for review of this use.

The entire submission is being made as an electronic submission only using the EPA CDX Pesticide Submission Portal (PSP).

The IR-4 Project has received a request from the state of California for the clearance of sulfur dioxide in or on fig as a post-harvest treatment for the control of aspergillus mold, botrytis fruit rot, soft rot, and surface mold. This use has been supported by Section 18 emergency exemptions. Sulfur dioxide, both as a gas and from slow release pads containing metabisulfite, controls fruit decay on fresh figs. Volume 2 of this submission includes residue data resulting from both the gas use and the slow-release pad use, but at this time a registration is sought only for the gas. There is no technical product for sulfur dioxide gas, thus all of the supporting documents in this submission are for the end-use product.

There are currently no established CODEX or Canadian and/or Mexican MRLs for sulfur dioxide in/on figs.

The waiver request for immunotoxicity was submitted under MRID 49944407. The developmental neurotoxicity data was submitted under MRID 49944406.

*This material is based upon work that is supported by the National Institute of Food and Agriculture, U.S. Department of Agriculture, under award number 2015-34383-23710 with substantial cooperation and support from the State Agricultural Experiment Stations and USDA-ARS.*

**RUTGERS**  
THE STATE UNIVERSITY  
OF NEW JERSEY

**DOCUMENTUM**



**Product: The Fruit Doctor EPA Reg. No.: 11195-1**

## List of Studies Submitted in Support of Proposed Tolerances for Sulfur Dioxide

Vol. No	Volume Title	MRID No. / PP No.
1	Petition (Administrative Volume Only, No Study)	
2	Sulfur Dioxide: Magnitude of the Residue on Fresh Fig	50004301

The IR-4 tolerance petition for sulfur dioxide in/on fig, is in the public interest:

1. The data submitted have been developed by IR-4.
2. The active ingredient in the petition is already registered on another food crop.
3. The active ingredient/crop combination has not been prescreened because it was prioritized before we started the RED/YELLOW/GREEN LIGHT process in 2009.
4. The crop is grown on less than 300,000 acres in the U.S. and the use has been associated with Section 18 registrations.

IR-4 in cooperation with the registrant, Snowden Enterprises, Inc., is requesting an exemption of the registration services fee for this tolerance petition.

Also included are the following:

- Letter of Authorization from the registrant
- Draft Labels for the end-use product (one plain and one with changes highlighted)
- EPA Form 8570-1 (Rev. 8-94) for the end-use product
- EPA Form 8570-34 Certification with Respect to Proper Citation of Data (from the registrant) for the end-use product
- EPA Form 8570-35 (EPA-only and public copies) for the end-use product
- Notice of Filing

Yours very truly,

Interregional Research Project No. 4

Petitioner

Per 

Kenneth S. Samoil, Technical Coordinator  
IR-4 Project Headquarters  
Rutgers, The State University of New Jersey  
500 College Road East, Suite 201W  
Princeton, NJ 08540

Copies: Ann Tillman, Pyxis

IR-4 Western Regional Coordinator

*This material is based upon work that is supported by the National Institute of Food and Agriculture, U.S. Department of Agriculture, under award number 2015-34383-23710 with substantial cooperation and support from the State Agricultural Experiment Stations and USDA-ARS.*

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THE STATE UNIVERSITY  
OF NEW JERSEY



Pest Management Solutions for  
Specialty Crops and Minor Uses

IR-4 Headquarters  
Rutgers, The State University of New Jersey  
500 College Road East, Suite 201 W  
Princeton, NJ 08540  
732.932.9575  
fax: 609.514.2612  
www.ir4.rutgers.edu

---

August 26, 2016

Andi Cameron  
California Department of Pesticide Regulation  
Pesticide Registration Branch  
1001 I Street  
Box 4015  
Sacramento, CA 958142828

Dear Andi:

The following pages include the information from the submission letter for the sulfur dioxide / fig study that was electronically submitted to the US EPA on August 26, 2016.

Yours very truly,  
Interregional Research Project No. 4  
Petitioner

Per 

Kathryn Homa for Kenneth S. Samoil  
Technical Coordinator, IR-4 Project Headquarters  
Rutgers, The State University of New Jersey  
500 College Road East, Suite 201 W  
Princeton, NJ 08540

Copies: Ann Tillman, Pyxis; Kirk Shermer, President, Snowden Enterprises, Inc.  
IR-4 Western Regional Coordinator  
Debbie Carpenter, Dan Kunkel (IR-4 letter only)

*Major funding for IR-4 is provided by Special Research Grants and Hatch Act Funds from USDA-CSREES,  
in cooperation with the State Agricultural Experiment Stations and USDA-ARS.*

THE STATE UNIVERSITY OF NEW JERSEY

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**DOCUMENTUM**  
**18**



IR-4 Project Headquarters  
Rutgers, The State University of New Jersey  
500 College Road East, Suite 201W  
Princeton, NJ 08540  
732-932-9575 fax: 609-514-2612  
www.ir4.rutgers.edu

Pest Management  
Solutions for Specialty  
Crops and Minor Uses

August 26, 2016

Ms. Barbara Madden  
1 Potomac Yard  
2777 Crystal Drive  
Arlington, VA 22202

Dear Ms. Madden:

RE: Sulfur Dioxide  
**The Fruit Doctor** EPA Reg. No.: 11195-1  
Sulfur Dioxide (determined as (SO<sub>2</sub>))

Commodity or Crop Group	IR-4 PR No.*	Support for Tolerance Proposal
Fig	<b>10114</b>	Volume 2

\*PR numbers in **bold** have data volumes in this submission

Category: R170 \$66,124

The undersigned, Mr. Kenneth S. Samoil, Technical Coordinator, Interregional Research Project No. 4, State Agricultural Experiment Station, Rutgers, The State University of New Jersey, 500 College Road East, Suite 201W, Princeton, NJ, 08540, on behalf of the IR-4 Project and the Agricultural Experiment Station of California submits this petition pursuant to Section 408(e) of the Federal Food, Drug and Cosmetic Act, as amended, with respect to the pesticide chemical, Sulfur Dioxide (40 CFR 180.444). We request that this petition be reviewed under the Pesticide Registration Improvement Act and that EPA should exempt the registration fee for review of this use.

The entire submission is being made as an electronic submission only using the EPA CDX Pesticide Submission Portal (PSP).

The IR-4 Project has received a request from the state of California for the clearance of sulfur dioxide in or on fig as a post-harvest treatment for the control of aspergillus mold, botrytis fruit rot, soft rot, and surface mold. This use has been supported by Section 18 emergency exemptions. Sulfur dioxide, both as a gas and from slow release pads containing metabisulfite, controls fruit decay on fresh figs. Volume 2 of this submission includes residue data resulting from both the gas use and the slow-release pad use, but at this time a registration is sought only for the gas. There is no technical product for sulfur dioxide gas, thus all of the supporting documents in this submission are for the end-use product.

There are currently no established CODEX or Canadian and/or Mexican MRLs for sulfur dioxide in/on figs.

The waiver request for immunotoxicity was submitted under MRID 49944407. The developmental neurotoxicity data was submitted under MRID 49944406.

*This material is based upon work that is supported by the National Institute of Food and Agriculture, U.S. Department of Agriculture, under award number 2015-34383-23710 with substantial cooperation and support from the State Agricultural Experiment Stations and USDA-ARS.*





**Product: The Fruit Doctor EPA Reg. No.: 11195-1**

## List of Studies Submitted in Support of Proposed Tolerances for Sulfur Dioxide

Vol. No	Volume Title	MRID No. / PP No.
1	Petition (Administrative Volume Only, No Study)	
2	Sulfur Dioxide: Magnitude of the Residue on Fresh Fig	50004301

The IR-4 tolerance petition for sulfur dioxide in/on fig, is in the public interest:

1. The data submitted have been developed by IR-4.
2. The active ingredient in the petition is already registered on another food crop.
3. The active ingredient/crop combination has not been prescreened because it was prioritized before we started the RED/YELLOW/GREEN LIGHT process in 2009.
4. The crop is grown on less than 300,000 acres in the U.S. and the use has been associated with Section 18 registrations.

This submission shall be reviewed by the California Department of Pesticide Regulation as part of the workshare agreement with the U.S. Environmental Protection Agency.

IR-4 in cooperation with the registrant, Snowden Enterprises, Inc., is requesting an exemption of the registration services fee for this tolerance petition.

Also included are the following:

- Letter of Authorization from the registrant
- Draft Labels for the end-use product (one plain and one with changes highlighted)
- EPA Form 8570-1 (Rev. 8-94) for the end-use product
- EPA Form 8570-34 Certification with Respect to Proper Citation of Data (from the registrant) for the end-use product
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- Notice of Filing

Yours very truly,

Interregional Research Project No. 4

Petitioner

Per 

Kenneth S. Samoil, Technical Coordinator  
IR-4 Project Headquarters  
Rutgers, The State University of New Jersey  
500 College Road East, Suite 201W  
Princeton, NJ 08540

Copies: Ann Tillman, Pyxis

IR-4 Western Regional Coordinator

California Department of Pesticide Regulation

*This material is based upon work that is supported by the National Institute of Food and Agriculture, U.S. Department of Agriculture, under award number 2015-34383-23710 with substantial cooperation and support from the State Agricultural Experiment Stations and USDA-ARS.*

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United States  
Environmental Protection Agency  
Washington, DC 20460

☐ Registration  
☒ Amendment  
☐ Other

OPP Identifier Number

## Application for Pesticide - Section I

1. Company/Product Number Snowden Enterprises, Inc./11195-1	2. EPA Product Manager H. Garvie	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Snowden Enterprises, Inc./The Fruit Doctor/Compressed Sulfur Dioxide	PM# 24	
5. Name and Address of Applicant (Include ZIP Code) Snowden Enterprises, Inc. c/o Pyxis Regulatory Consulting Inc. 4110 136th St. Ct. NW Gig Harbor, WA 98332 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

## Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

PRIA Fee Category: None (Tolerance Petition and Amendments are being submitted by IR-4)

REGFEE Not applicable. IR-4 petition and amendment to establish tolerance on figs

## Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

## Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Ann M. Tillman		Title Agent		Telephone No. (Include Area Code) (253) 853-7369	
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature 		3. Title Agent			
4. Typed Name Ann M. Tillman		5. Date Aug. 18, 2016			

# PRIA 3 – 21 Day Content Screen Review Worksheet

(EPA/OPP Use Only)

September 2012

21 Day Screen Start Date: 8-26-16

Experts In-Processing Signature: B.B. Date 9-1-16 Fee Paid: Yes ☐

Division management contacted on issues No ☐ Yes ☐ Date                     

EPA Reg. Number: <u>11195-1</u>		EPA Receipt Date: <u>8-26-16</u>				
Items for Review				Yes	No	N/A*
1	Application Form (EPA Form 8570-1) signed & complete including package type			X		
2	Confidential Statement of Formula all boxes completed, form signed, and dated (EPA Form 8570-4)					X
	a) All <u>inerts</u> , including fragrances, approved for the proposed uses (see Footnote A)	yes	no			
3	Certification with Respect to Citation of Data (EPA Form 8570-34) completed and signed (N/A if 100% repack)			X		
	Certificate and data matrix consistent			X		
	If applicant is relying on data that are compensable, is the offer to pay statement included. (see Footnote B)	yes	no			
	If applicable, is there a letter of Authorization for exclusive use only.					
4	Formulator's Exemption Statement (EPA Form 8570-27) completed and signed (N/A if source is unregistered or applicant owns the technical)					X
	Data Matrix (EPA Form 8570-35) both internal and external copies (PR 98-5) completed and signed (N/A if 100% repack)			X		
5	a) Selective Method (Fee category experts use)	yes	no			
	b) Cite-All (Fee category experts use)	X				
	c) Applicant owns all data (Fee category experts use)					
6	5 Copies of <u>Label</u> (Electronic labels on CD are encouraged and guidance is available)			X		
7	Is the data package consistent with <u>PR Notice 86-5</u>					X
8	<u>Notice of Filing</u> included with petitions					X

9	If applicable for conventional applications, <u>reduced risk rationale</u>			
10	<u>Required Data</u> and/or data waivers. See Footnote C.			
	a) List study (or studies) not included with application			

Comments:

Documentation: Pass or Fail  
- All Required Forms Complete

Inerts: Pass or Fail  
- No Inerts to Review

PRN 11-03: Pass or Fail  
- No Studies Submitted

9/2/16

Overall Status: Pass or Fail



\* N/A – Not Applicable

#### Footnotes

A. During the 21 day initial content review, all CSFs will be reviewed to determine whether all inerts listed, including fragrances, are approved for the proposed uses or have an application pending with the Agency. If an unapproved inert with no application pending with the Agency is identified, the applicant must either 1) resolve the inert issue by, for example, removing the inert, substituting it with an approved inert, submitting documentation that EPA approved the inert for the proposed pesticidal uses, correcting mistakes on the CSF, etc. or 2) provide the data to support OPP approval of the inert or 3) withdraw the application. Removing or substituting an inert ingredient will require a new CSF and may require submission of data. All information, forms, data and documentation resolving the inert issue must have been received by the Agency or the application withdrawn within the 21 day period, otherwise, the Agency will reject the application as described below.

To successfully complete this aspect of the 21 day initial content screen, applicants are **strongly encouraged** to verify that all inert ingredients have been approved for the application's uses or have an application pending with the Agency **even if a product is currently registered** by consulting the [inert Web site](#) and if the inert is not approved nor has an application pending with the Agency, to **obtain the necessary inert approval prior to submitting an application to register a pesticide product containing that inert ingredient**. Some inert ingredients are no longer approved for food uses or certain types of uses. The name and/or CAS number on a CSF must match the name and CAS number on this web site. Simple typographical errors in the name or CAS number have resulted in processing delays.

If an inert is not listed on the inert ingredient web site and the applicant believes that the inert has been approved, the applicant should contact the Inert Ingredient Assessment Branch (IIAB) at [inertsbranch@epa.gov](mailto:inertsbranch@epa.gov) and resolve the issue. Copies of the correspondence with IIAB resolving the issue should accompany the application. All new inerts except PIP inerts are reviewed by IIAB. The IIAB should also be contacted for any questions on what supporting data needs to be submitted for and the Agency's inert review process. Questions on PIP inerts should be directed to the [Chief of Microbial Pesticides Branch](#).

When a brand, trade, or proprietary name of an inert ingredient is listed on a CSF, additional information such as an alternate name of the inert, CAS number or other information must also be included to enable the Agency to determine if it has been approved. Each component of an inert mixture (including a fragrance) must be identified. In some cases, the supplier of the mixture or fragrance may need to provide this information to the Agency. Prior to the Agency's receipt of an application, applicants must arrange with a proprietary mixture or fragrance supplier to provide the component information to the Agency or promptly upon EPA's request. If the inert ingredients in a proprietary blend (including fragrances) cannot or are not identified or provided within the 21-day content review period, the Agency will reject the application.

During the 21 day content review, applicants should submit information to the individual identified by the Agency when the applicant is informed of an unapproved inert.

### **Unapproved Inerts Identified on CSFs**

#### **All applications except conventional new products and PIPs**

Once an unapproved inert is identified on a CSF, the Agency will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Provide the required information necessary to identify an inert approval application that is pending with the Agency; or
3. Submit the information and data needed for the Agency to approve the unapproved inert. If this option is selected and implemented, the Agency may request an extension in the PRIA decision review timeframe to accommodate the inert review/approval process;
4. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of these options is selected and implemented by the applicant within the 21 day content review period, the Agency will reject the application and retain 25% of the full fee of the category identified.

#### **Conventional New Product Applications**

When the Registration Division identifies an unapproved inert on a CSF with an application for a new product that the applicant has not identified as requiring an inert approval (R300 or R301), it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Submit the information and data needed for the Agency to approve the unapproved inert, including any required petition to establish or amend a tolerance or exemption from a tolerance. (This option may change the PRIA category for the application, which could require a longer decision review time and a larger fee. If additional fees are due, they must be received by the Agency within the 21 day content review period.)



3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21-day content-review period, the Agency will reject the application and retain 25% of the appropriate fee for the new product-inert approval category.

#### PIP Applications

When the Biopesticide and Pollution Prevention Division identifies an unapproved inert on a PIP CSF and a request to approve the inert does not accompany the application, it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the spelling or name of the inert to that in 40 CFR 174, or providing documentation that the inert has been approved; or
2. Submit the information and data needed for the Agency to approve the unapproved inert. If an inert ingredient tolerance exemption petition is required, the petition must be received by the Agency and the B903 fee paid within the 21 day period. If this option is selected and implemented, the Agency will discuss harmonizing the timeframe for both actions.
3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21 day content review period, the Agency will reject the application and retain 25% of the fee.

B. A policy on documentation of offers to pay is still being developed, however, for a me-too or fast track (similar/identical) new product, R300 or A530, an application without the necessary authorizations of offers to pay will be placed into either R301 or A531. The Agency recommends that authorizations of offers to pay be submitted with other PRIA applications to avoid delays in the Agency's decision.

C. Biopesticide applicants are advised to contact the Agency and discuss study waivers prior to submitting their application to the Agency. Documentation of such discussions should be submitted with the study waiver.





**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**401 M Street, S.W.**  
**WASHINGTON, D.C. 20460**

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**Certification with Respect to Citation of Data**

Applicant's/Registrant's Name, Address, and Telephone Number Snowden Enterprises c/o Pyxis Regulatory Consulting 4110 136th St. Ct NW Gig Harbor, WA 253-853-7369	EPA Registration Number/File Symbol 11195-1
Active Ingredient(s) and/or representative test compound(s) Sulfur Dioxide	Date Aug. 18, 2016
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Indoor Food	Product Name The Fruit Doctor/Compressed Sulfur Dioxide

**NOTE:** If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

**SECTION I: METHOD OF DATA SUPPORT** (Check one method only)

<input type="checkbox"/> I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	<input checked="" type="checkbox"/> I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).
--	---

**SECTION II: GENERAL OFFER TO PAY**

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☐ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

**SECTION III: CERTIFICATION**

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature  Digitally signed by Ann M. Tillman DN: cn=Ann M. Tillman, o=Pyxis Regulatory Consulting, Inc., ou=Pyxis, email=Ann@PyxisRC.com, c=US Date: 2016.08.18 09:28:24 -0400	Date Aug. 18, 2016	Typed or Printed Name and Title Ann M. Tillman, Agent
--	-----------------------	--

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**401 M Street, S.W.**  
**WASHINGTON, D.C. 20460**

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**DATA MATRIX**

Date July 21, 2016	EPA Reg No./File Symbol 11195-1	Page 1 of 16
Applicant's/Registrant's Name & Address Snowden Enterprises, Inc. P.O. Box 751 Fresno, CA 93712	Product The Fruit Doctor/Compressed Sulfur Dioxide	
Ingredient Sulfur Dioxide (CAS No. 7446-09-5)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
<b>Product Specific Data Requirements</b>					
830.1550	Product Identity and Composition	47466501	Snowden Enterprises, Inc.	OWN	
830.1600	Description of Materials Used to Produce the Product	47466501	Snowden Enterprises, Inc.	OWN	
830.1620	Description of Production Process	47466501	Snowden Enterprises, Inc.	OWN	
830.1650	Description of Formulation Process				Not required <sup>1</sup>
830.1670	Discussion of Formation of Impurities	47466501	Snowden Enterprises, Inc.	OWN	
830.1700	Preliminary Analysis	47466501	Snowden Enterprises, Inc.	OWN	
830.1750	Certified Limits	47466501	Snowden Enterprises, Inc.	OWN	
830.1800	Enforcement Analytical Method	47466501	Snowden Enterprises, Inc.	OWN	
830.6302	Color	47466501	Snowden Enterprises, Inc.	OWN	
830.6303	Physical State	47466501	Snowden Enterprises, Inc.	OWN	
830.6304	Odor	47466501	Snowden Enterprises, Inc.	OWN	
830.6313	Stability to Normal and Elevated Temperatures, Metals, and Metal Ions				See endnote <sup>2</sup>
830.6314	Oxidation/Reduction: Chemical Incompatibility				See endnote <sup>3</sup>

Signature 	Name and Title Consultant	Date July 21, 2016
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## DATA MATRIX

Date July 21, 2016			EPA Reg No./File Symbol 11195-1		Page 2 of 16
Applicant's/Registrant's Name & Address Snowden Enterprises, Inc. P.O. Box 751 Fresno, CA 93712			Product The Fruit Doctor/Compressed Sulfur Dioxide		
Ingredient Sulfur Dioxide (CAS No. 7446-09-5)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6315	Flammability				See endnote <sup>4</sup>
830.6316	Explosibility				Not applicable <sup>5</sup>
830.6317	Storage Stability	47466501	Snowden Enterprises, Inc.	OWN	
830.6319	Miscibility				Not applicable <sup>6</sup>
830.6320	Corrosion Characteristics				See endnote <sup>7</sup>
830.6321	Dielectric Breakdown Voltage				Not applicable <sup>8</sup>
830.7000	pH				Not applicable <sup>9</sup>
830.7050	UV/Visible Absorption				Not applicable <sup>10</sup>
830.7100	Viscosity				Not applicable <sup>11</sup>
830.7200	Melting Point/Melting Range	47466501	Snowden Enterprises, Inc.	OWN	
830.7220	Boiling Point/Boiling Range	47466501	Snowden Enterprises, Inc.	OWN	
830.7300	Density/Relative Density/Bulk Density	47466501	Snowden Enterprises, Inc.	OWN	
830.7370	Dissociation Constants in Water				Not applicable <sup>12</sup>
830.7520	Particle Size, fiber length, and diameter distribution				Not applicable <sup>13</sup>

Signature 	Name and Title Consultant	Date July 21, 2016
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**DATA MATRIX**

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Applicant's/Registrant's Name & Address Snowden Enterprises, Inc. P.O. Box 751 Fresno, CA 93712			Product The Fruit Doctor/Compressed Sulfur Dioxide		
Ingredient Sulfur Dioxide (CAS No. 7446-09-5)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7550	Partition Coefficient (n-octanol/water), Shake Flask Method				Not applicable <sup>14</sup>
830.7560	Partition Coefficient (n-octanol/water), Generator Column Method				See 830.7550
830.7570	Partition Coefficient (n-octanol/water), Estimation by Liquid Chromatography				See 830.7550
830.7840	Water Solubility: Column Elution Method; Shake Flask Method	47466501	Snowden Enterprises, Inc.	OWN	
830.7860	Water Solubility, Generator Column Method				See 830.7840
330.7950	Vapor Pressure				Not applicable <sup>15</sup>
<b>Generic Data Requirements</b>					
835.1230	Leaching/Adsorption/Desorption				See endnote <sup>16</sup>
835.1410	Volatility – Laboratory				See endnote <sup>16</sup>
835.2120	Hydrolysis				See endnote <sup>16</sup>
835.2240	Photodegradation in Water				See endnote <sup>16</sup>
835.2370	Photodegradation in Air				See endnote <sup>16</sup>
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Applicant's/Registrant's Name & Address Snowden Enterprises, Inc. P.O. Box 751 Fresno, CA 93712	Product The Fruit Doctor/Compressed Sulfur Dioxide	
Ingredient Sulfur Dioxide (CAS No. 7446-09-5)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
835.2410	Photodegradation in Soil				See endnote <sup>16</sup>
835.4100	Aerobic Soil Metabolism				See endnote <sup>16</sup>
835.4200	Anaerobic Soil Metabolism				See endnote <sup>16</sup>
835.4300	Aerobic Aquatic Metabolism				See endnote <sup>16</sup>
835.4400	Anaerobic Aquatic Metabolism				See endnote <sup>16</sup>
835.6100	Soil Field Dissipation Study				See endnote <sup>16</sup>
835.6200	Aquatic Sediment Field Dissipation Study				See endnote <sup>16</sup>
835.6300	Forest Field Dissipation Study				See endnote <sup>16</sup>
835.6400	Combination and Tank Mixes				See endnote <sup>16</sup>
835.7100	Ground Water Monitoring				See endnote <sup>16</sup>
835.8100	Volatility – Field				See endnote <sup>16</sup>
850.2100	Acute Avian Oral Toxicity				See endnote <sup>17</sup>
850.2200	Acute Avian Dietary Toxicity				See endnote <sup>17</sup>
850.2300	Avian Reproductive Toxicity				See endnote <sup>17</sup>
850.2400	Wild Mammal Toxicity				See endnote <sup>17</sup>

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Applicant's/Registrant's Name & Address Snowden Enterprises, Inc. P.O. Box 751 Fresno, CA 93712	Product The Fruit Doctor/Compressed Sulfur Dioxide	
Ingredient Sulfur Dioxide (CAS No. 7446-09-5)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
850.2500	Simulated or Actual Field Testing				See endnote <sup>17</sup>
SS-1234	Special Study: Avian Acute Inhalation Toxicity with the Bobwhite Quail	49804202	Snowden Enterprises, Inc.	PL/OWN	
850.1010	Freshwater Invertebrate Toxicity				See endnote <sup>18</sup>
850.1025, 850.1035, 850.1045, 850.1055, 850.1075	Acute Toxicity Estuarine and Marine Organisms				See endnote <sup>18</sup>
850.1300	Aquatic Invertebrate Life Cycle (Freshwater)				See endnote <sup>18</sup>
850.1350	Aquatic Invertebrate Life Cycle (Saltwater)				See endnote <sup>18</sup>
350.1400	Fish Early Life Stage (Freshwater and Saltwater)				See endnote <sup>18</sup>
850.1500	Life Cycle Fish				See endnote <sup>18</sup>
850.1710, 850.1730, 850.1850	Aquatic Organisms Bioavailability, Biomagnification, Toxicity				See endnote <sup>18</sup>
850.1735	Whole Sediment: Acute Freshwater Invertebrates				See endnote <sup>18</sup>
850.1740	Whole Sediment: Acute Marine Invertebrates				See endnote <sup>18</sup>

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Ingredient Sulfur Dioxide (CAS No. 7446-09-5)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
850.1790	Whole Sediment: Chronic Invertebrates Freshwater and Marine				See endnote <sup>18</sup>
850.1950	Simulated or Actual Field Testing for Aquatic Organisms				See endnote <sup>18</sup>
850.3020	Honeybee Acute Contact Toxicity				See endnote <sup>19</sup>
850.3030	Honeybee Toxicity of Residues on Foliage				See endnote <sup>19</sup>
850.3040	Field Testing for Pollinators				See endnote <sup>19</sup>
SS-1233	Special Study: Honeybee Acute Vapor Exposure	49804202	Snowden Enterprises, Inc.	PL/OWN	
850.4025	Target Area Phytotoxicity				See endnote <sup>20</sup>
850.4100	Tier I and II: Seedling Emergence				See endnote <sup>20</sup>
850.4150	Tier I and II: Vegetative Vigor				See endnote <sup>20</sup>
850.4300	Tier III: Terrestrial Field				See endnote <sup>20</sup>
850.4400, 850.5400	Tier I and II: Aquatic Plant Growth (algal and aquatic vascular plant toxicity)				See endnote <sup>20</sup>

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Ingredient Sulfur Dioxide (CAS No. 7446-09-5)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
850.4450	Tier III: Aquatic Field				See endnote <sup>20</sup>
SS-1235	Special Study: Vegetative Vigor Vapor Phase	49804202	Snowden Enterprises, Inc.	PL/OWN	
860.1100	Chemical Identity				See endnote <sup>21</sup>
860.1200	Directions for Use				See endnote <sup>22</sup>
860.1300	Nature of the Residue: Plants	42552401	Snowden Enterprises, Inc.	OWN	
860.1300	Nature of the Residue: Livestock				See endnote <sup>23</sup>
860.1340	Residue Analytical Methods	40695602 40169601	Snowden Enterprises, Inc. Snowden Enterprises, Inc.	OWN OWN	
860.1360	Multiresidue Method				See endnote <sup>24</sup>
860.1380	Storage Stability	40695604	Snowden Enterprises, Inc.	OWN	
860.1400	Potable Water				See endnote <sup>25</sup>
860.1400	Fish				See endnote <sup>25</sup>
860.1400	Irrigated Crops				See endnote <sup>25</sup>
860.1460	Food Handling				See endnote <sup>26</sup>

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Ingredient Sulfur Dioxide (CAS No. 7446-09-5)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1480	Magnitude of the Residue in Meat, Milk, Poultry, and Eggs				See endnote <sup>23</sup>
860.1500	Magnitude of the Residue in Plants and Processed Fractions: Figs	Volume 2	IR-4	PL	
860.1500	Magnitude of the Residue in Plants: Grapes	41630601 41275702 41275701 41074502 41074501 40695613 40695612 40695611 40695610 40695609 40695608 40695607	Snowden Enterprises, Inc. Snowden Enterprises, Inc. Snowden Enterprises, Inc. Snowden Enterprises, Inc. Snowden Enterprises, Inc. Snowden Enterprises, Inc. Snowden Enterprises, Inc. Snowden Enterprises, Inc. Snowden Enterprises, Inc. Snowden Enterprises, Inc. Snowden Enterprises, Inc. Snowden Enterprises, Inc.	OWN OWN OWN OWN OWN OWN OWN OWN OWN OWN OWN OWN	

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Ingredient Sulfur Dioxide (CAS No. 7446-09-5)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1500	Magnitude of the Residue in Plants: Grapes	40695606 40695605 40695603 40695602 40695601	Snowden Enterprises, Inc. Snowden Enterprises, Inc. Snowden Enterprises, Inc. Snowden Enterprises, Inc. Snowden Enterprises, Inc.	OWN OWN OWN OWN OWN	
860.1520	Magnitude of the Residue in Processed Fractions: Grapes	40695608 40695603	Snowden Enterprises, Inc. Snowden Enterprises, Inc.	OWN OWN	
860.1540	Anticipated Residues				See endnote <sup>27</sup>
860.1550	Proposed Tolerance	Volume 1	IR-4	PL	
860.1560	Reasonable grounds in support of petition	Volume 1	IR-4	PL	
860.1650	Submittal of analytical reference standards				See endnote <sup>28</sup>
860.1850	Confined Rotational Crops				See endnote <sup>29</sup>
860.1900	Field Rotational Crops				See endnote <sup>29</sup>
870.1100	Acute Oral Toxicity: Rat	49944401	Snowden Enterprises, Inc.	PL	

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Ingredient Sulfur Dioxide (CAS No. 7446-09-5)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.1200	Acute Dermal Toxicity: Rat	49944401	Snowden Enterprises, Inc.	PL	
870.1300	Acute Inhalation Toxicity: Rat	49944401	Snowden Enterprises, Inc.	PL	
870.2400	Primary Eye Irritation: Rabbit	49944401	Snowden Enterprises, Inc.	PL	
870.2500	Primary Dermal Irritation	49944401	Snowden Enterprises, Inc.	PL	
870.2600	Dermal Sensitization	49944401	Snowden Enterprises, Inc.	PL	
870.6100	Delayed Neurotoxicity (Acute) – Hen				Not Applicable <sup>30</sup>
870.6200	Acute Neurotoxicity – Rat	49944406	Snowden Enterprises, Inc.	PL	
870.3100	90-Day Oral: Rodent	49944403	Snowden Enterprises, Inc.	PL	
870.3150	90-Day Oral: Non-rodent	49944403	Snowden Enterprises, Inc.	PL	
870.3200	21/28-Day Dermal Toxicity				Not Applicable <sup>31</sup>
870.3250	90-Day Dermal Toxicity				See endnote <sup>31</sup>
870.3465	90-Day Inhalation Toxicity	49944403	Snowden Enterprises, Inc.	PL	
870.6100	28-Day Delayed Neurotoxicity Hen				Not Applicable <sup>30</sup>
870.6200	90-Day Neurotoxicity	49944406	Snowden Enterprises, Inc.	PL	
870.4100	Chronic Oral Rodent	49944404	Snowden Enterprises, Inc.	PL	
870.4200	Carcinogenicity	49944404	Snowden Enterprises, Inc.	PL	

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Ingredient Sulfur Dioxide (CAS No. 7446-09-5)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.3700	Reproduction/Developmental Toxicity Screening Test	49944405	Snowden Enterprises, Inc.	PL	
870.3800	2-Generation Reproduction: Rat	49944405	Snowden Enterprises, Inc.	PL	
870.6300	Developmental Neurotoxicity Study	49944406	Snowden Enterprises, Inc.	PL	
870.5100	Bacterial Reverse Mutation Test	49944402	Snowden Enterprises, Inc.	PL	
870.5300, 830.5375	<i>In vitro</i> Mammalian Cell Assay	49944402	Snowden Enterprises, Inc.	PL	
870.5385, 870.5395	<i>In vivo</i> Cytogenetics	49944402	Snowden Enterprises, Inc.	PL	
870.7485	Metabolism and Pharmacokinetics	49944401 49944403	Snowden Enterprises, Inc. Snowden Enterprises, Inc.	PL PL	
870.7200	Companion Animal Safety				See endnote <sup>32</sup>
870.7600	Dermal Penetration				See endnote <sup>33</sup>
870.7800	Immunotoxicity	49944407	Snowden Enterprises, Inc.	PL	
None	Special Studies – Human studies	49944408	Snowden Enterprises, Inc.	PL	
None	Special Studies – Weight of the Evidence	49944409	Snowden Enterprises, Inc.	PL	
875.1100	Dermal Exposure – Outdoor				Not applicable <sup>34</sup>
875.1200	Dermal Exposure - Indoor				Not applicable <sup>35</sup>

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Ingredient Sulfur Dioxide (CAS No. 7446-09-5)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
875.1300	Inhalation Exposure – Outdoor				Not applicable <sup>34</sup>
875.1400	Inhalation Exposure – Indoors			GAP	See endnote <sup>36</sup>
875.1500	Biological Monitoring				See endnote <sup>37</sup>
875.1600	Data Reporting and Calculations				See endnote <sup>37</sup>
875.1700	Product Use Information	498042401	Snowden Enterprises, Inc.	OWN	
875.2100	Dislodgeable Foliar Residue and Turf Transferable Residues				See endnote <sup>38</sup>
875.2200	Soil Residue Dissipation				See endnote <sup>38</sup>
875.2300	Indoor Surface Residue Dissipation				See endnote <sup>39</sup>
875.2400	Dermal Exposure				See endnote <sup>39</sup>
875.2500	Inhalation Exposure			GAP	See endnote <sup>40</sup>
875.2600	Biological Monitoring				See endnote <sup>41</sup>
875.2700	Product Use Information	49804201	Snowden Enterprises, Inc.	OWN	
875.2800	Descriptions of Human Activity				See endnote <sup>41</sup>
875.2900	Data Reporting and Calculations				See endnote <sup>41</sup>
875.3000	Nondietary Ingestion Exposure				See endnote <sup>41</sup>

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Ingredient Sulfur Dioxide (CAS No. 7446-09-5)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
890.1100	Amphibian Metamorphosis (Rat)				See endnote <sup>42</sup>
890.1150	Androgen Receptor Binding (Rat Prostate)				See endnote <sup>42</sup>
890.1200	Aromatase (Human Recombinant)				See endnote <sup>42</sup>
890.1250	Estrogen Receptor Binding				See endnote <sup>42</sup>
890.1300	Estrogen Receptor Transcriptional Activation Assay				See endnote <sup>42</sup>
890.1350	Fish Short-Term Reproduction				See endnote <sup>42</sup>
890.1400	Hershberger (Rat)				See endnote <sup>42</sup>
890.1450	Female Pubertal (Rat)				See endnote <sup>42</sup>
890.1500	Male Pubertal (Rat)				See endnote <sup>42</sup>
890.1550	Steroidogenesis				See endnote <sup>42</sup>
890.1600	Uterotrophic (Rat)				See endnote <sup>42</sup>
201-1	Droplet size spectrum				See endnote <sup>43</sup>
202-1	Droplet Size Spectrum				See endnote <sup>43</sup>

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## Endnotes for Data Matrix for The Fruit Doctor/Compressed Sulfur Dioxide

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- <sup>1</sup> **830.1650** - These data are not required for the registration of this product since it is used without further formulation of the manufacturing use product. See 830.1620 for the description of the production process.
- <sup>2</sup> **830.6313** - According to the Aug. 27, 2008 EPA review (DP355348) of the product chemistry data (MRID 47466501) for The Fruit Doctor/Compressed Sulfur Dioxide, the product is stable (based on the MSDS). Moist gas corrodes most metals.
- <sup>3</sup> **830.6314** - Based on the Aug. 27, 2008 EPA review (DP355348) of the product chemistry data (MRID 47466501) for The Fruit Doctor/Compressed Sulfur Dioxide, the product is a strong reducing agent (based on the MSDS and other available data).
- <sup>4</sup> **830.6315** - Based on the Aug. 27, 2008 EPA review (DP355348) of the product chemistry data (MRID 47466501) for The Fruit Doctor/Compressed Sulfur Dioxide, the product is non-flammable (based on the MSDS and CSF).
- <sup>5</sup> **830.6316** - The Aug. 27, 2008 EPA review (DP355348) of the product chemistry data (MRID 47466501) for The Fruit Doctor/Compressed Sulfur Dioxide (The Fruit Doctor) noted that this guideline is not applicable because the product has no impact on explosive characteristics.
- <sup>6</sup> **830.6319** - The Aug. 27, 2008 EPA review (DP355348) of the product chemistry data (MRID 47466501) for The Fruit Doctor noted that this guideline is not applicable because the product is not an emulsifiable concentrate to be diluted with petroleum solvents.
- <sup>7</sup> **830.6320** - Based on the Aug. 27, 2008 EPA review (DP355348) of the product chemistry data (MRID 47466501) for The Fruit Doctor/Compressed Sulfur Dioxide, the product is not corrosive as a gas unless it comes into contact with moisture.
- <sup>8</sup> **830.6321** - The Aug. 27, 2008 EPA review (DP355348) of the product chemistry data (MRID 47466501) for The Fruit Doctor noted that this guideline is not applicable because the product is not used around electrical equipment.
- <sup>9</sup> **830.7000** - The Aug. 27, 2008 EPA review (DP355348) of the product chemistry data (MRID 47466501) for The Fruit Doctor found this guideline to be not applicable to a gas.
- <sup>10</sup> **830.7050** - The Aug. 27, 2008 EPA review (DP355348) of the product chemistry data (MRID 47466501) found this guideline to be not applicable to The Fruit Doctor.
- <sup>11</sup> **830.7100** - The Aug. 27, 2008 EPA review (DP355348) of the product chemistry data (MRID 47466501) found this guideline to be not applicable to The Fruit Doctor.
- <sup>12</sup> **830.7370** - The Aug. 27, 2008 EPA review (DP355348) of the product chemistry data (MRID 47466501) found this guideline to be not applicable to The Fruit Doctor.
- <sup>13</sup> **830.7520** - These data are required if the product is water insoluble and fibrous materials. These data are not applicable to The Fruit Doctor.
- <sup>14</sup> **830.7550** - The Aug. 27, 2008 EPA review (DP355348) of the product chemistry data (MRID 47466501) found this guideline to be not applicable to The Fruit Doctor.
- <sup>15</sup> **830.7950** - The Aug. 27, 2008 EPA review (DP355348) of the product chemistry data (MRID 47466501) found this guideline to be not applicable to The Fruit Doctor.
- <sup>16</sup> **835 Series** - These data have not been identified by EPA as being required for this product because exposure to the environment is expected to be limited based on the indoor uses and the fate properties of SO<sub>2</sub>.
- <sup>17</sup> **850.2100, 850.2200, 850.2300, 850.2400, 850.2500** - These data have not been identified by EPA as being required for this product because exposure to avian species is expected to be limited based on the indoor uses and the fate properties of SO<sub>2</sub>. See Special Study Guideline SS-1234.



## Endnotes for Data Matrix for The Fruit Doctor/Compressed Sulfur Dioxide

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- <sup>18</sup> **850.1010, 850.1025, 850.1035, 850.1045, 850.1055, 850.1075, 850.1300, 850.1350, 850.1400, 850.1500, 850.1710, 850.1730, 850.850.1850, 850.1735, 850.1740, 850.1790, 850.1950** - These data have not been identified by EPA as being required for this product because exposure to aquatic organisms is expected to be limited based on the indoor uses and the fate properties of SO<sub>2</sub>.
- <sup>19</sup> **850.3020, 850.3030, 850.3040** - These data have not been identified by EPA as being required for this product because exposure to bees is expected to be limited based on the indoor uses and the fate properties of SO<sub>2</sub>. See also Guideline SS-1233.
- <sup>20</sup> **850.4100, 850.4150, 850.4400, 850.5400, 850.4300, 850.4450, 850.4025** - These data have not been identified by EPA as being required for this product because exposure to seeds and to terrestrial plants is expected to be limited based on the indoor uses and the fate properties of SO<sub>2</sub>. See Special Study under Guideline SS-1235.
- <sup>21</sup> **860.1100** - These data are found under Guideline series 830.
- <sup>22</sup> **860.1200** - Refer to the product label for The Fruit Doctor/Compressed Sulfur Dioxide.
- <sup>23</sup> **860.1300, 860.1480** - These data have not been identified by EPA as being required for this product because there are no animal feed items associated with this type of use on grapes.
- <sup>24</sup> **860.1360** - These data have not been identified by EPA as being required for this product.
- <sup>25</sup> **860.1400** - These data have not been identified by EPA as being required for this product because it is applied indoors and is not applied directly to water or to water inhabited by fish.
- <sup>26</sup> **860.1460** - These data have not been identified by EPA as being required for this product because it is not used in food handling establishments.
- <sup>27</sup> **860.1540** - These data have not been identified by EPA as being required for this product because it is not applied to growing crops.
- <sup>28</sup> **860.1650** - A reference standard will be submitted to EPA by Snowden Enterprises, Inc. upon request.
- <sup>29</sup> **860.1850, 860.1900** - These data have not been required for this product because it is a gas and is used indoors.
- <sup>30</sup> **870.6100** - These data are not required since The Fruit Doctor is not an organophosphorous compound.
- <sup>31</sup> **870.3200, 870.3250** - These data have not been identified by EPA as being required based on the fact that inhalation is the primary route of exposure.
- <sup>32</sup> **870.7200** - The data are not required for The Fruit Doctor since the product is not applied to domestic animals.
- <sup>33</sup> **870.7600** - These data have not been identified by EPA as being required for this product based on the fact that inhalation is the primary route of exposure.
- <sup>34</sup> **875.1100, 875.1300** - These data are not required because the product is used indoors.
- <sup>35</sup> **875.1200** - The data are not required because the product is a gas and the applicator does not come into contact with the product.
- <sup>36</sup> **875.1400** - This study has been identified as a data gap in the Data Call-In (DCI) for inorganic sulfites. Snowden Enterprises, Inc. has agreed to generate these data in the November 11, 2104 90-day response to the DCI.
- <sup>37</sup> **875.1500, 875.1600** - These data have not been identified by EPA as being required for this product.
- <sup>38</sup> **875.2100, 875.2200** - The data are not applicable since this product is applied indoors.
- <sup>39</sup> **875.2300, 875.2400** - The data are not required because the product is a gas and the applicator does not come into contact with the product.

## Endnotes for Data Matrix for The Fruit Doctor/Compressed Sulfur Dioxide

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<sup>40</sup> **875.2500** - This study has been identified as a data gap in the Data Call-In (DCI) for inorganic sulfites. Snowden Enterprises, Inc. has agreed to generate these data in the November 11, 2104 90-day response to the DCI.

<sup>41</sup> **875.2600, 875.2800, 875.2900, 875.3000** - These data have not been identified by EPA as being required for this product.

<sup>42</sup> **890.1100, 890.1150, 890.1200, 890.1250, 890.1300, 890.1350, 890.1400, 890.1450, 890.1500, 890.1550, 890.1600** – These data have not been identified by EPA as being required at this time.

<sup>43</sup> **201-1, 202-1** – These data have not been required for this product because it is a gas and is used indoors.

PYXIS REGULATORY CONSULTING, INC.

4110 136<sup>th</sup> St. NW  
Gig Harbor, WA 98332

Phone: 253-853-7369  
Fax: 253-853-5516  
Mike@PyxisRC.com

December 1, 2015

COURIER DELIVERY

Shaja Joyner (PM 20)  
Document Processing Desk (**FNL LBL**)  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202-4501

RE: Snowden Enterprises, Inc. – The Fruit Doctor/Compressed Sulfur Dioxide  
(EPA Reg. No. 11195-1)  
Submission of the Final Printed Label per the Agency Letter dated October 21, 2015

Dear Ms. Joyner,

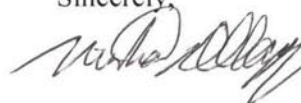
On behalf of Snowden Enterprises, Inc. and in response to the Agency letter dated October 21, 2015 enclosed please find the final printed label for The Fruit Doctor/Compressed Sulfur Dioxide.

In support of this submission, please find the enclosed documents:

1. Completed Application for Registration (EPA Form 8570-1)
2. One (1) copy of The Fruit Doctor/Compressed Sulfur Dioxide final printed label
3. Letter of Authorization

Please feel free to contact me by email (Mike@PyxisRC.com) or by phone at (253) 853-7369 if you have any questions or need any additional information.

Sincerely,



Michael Kellogg

Enclosures

cc: K. Shermer; Snowden Enterprises, Inc.

5555





United States  
Environmental Protection Agency  
Washington, DC 20460

☐ Registration  
☐ Amendment  
☒ Other

OPP Identifier Number

**Application for Pesticide - Section I**

1. Company/Product Number 11195-1	2. EPA Product Manager S. Joyner	3. Proposed Classification <input type="checkbox"/> None <input checked="" type="checkbox"/> Restricted
4. Company/Product (Name) Snowden Enterprises, Inc./The Fruit Doctor/Compressed Sulfur Dioxide	PM# 20	
5. Name and Address of Applicant (Include ZIP Code) Snowden Enterprises, Inc. c/o Pyxis Regulatory Consulting, Inc. 4110 136th St. NW Gig Harbor, WA 98332 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

**Section - II**

<input type="checkbox"/> Amendment - Explain below.	<input checked="" type="checkbox"/> Final printed labels in response to Agency letter dated 10/21/2015
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

**Explanation:** Use additional page(s) if necessary. (For section I and Section II.)

Submission of the final printed label in response to the Agency letter dated October 21, 2015. Please feel free to contact me by phone (253) 853-7369 or by email at Mike@PyxisRC.com if you have any questions or need any additional information.

**Section - III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal	
* Certification must be submitted				<input type="checkbox"/> Plastic	
If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container	<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	Gas cylinder
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input checked="" type="checkbox"/> Container		4. Size(s) Retail Container 0.5-150 lbs.		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled				<input type="checkbox"/> Other _____	

**Section - IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Michael Kellogg	Title Agent	Telephone No. (Include Area Code) (253)-853-7369
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Agent	
4. Typed Name Michael Kellogg	5. Date 12/1/15	

**45**

**RESTRICTED USE PESTICIDE**

Due to corrosive effects during inhalation and to eyes and skin. For retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's Certifications.

**THE FRUIT DOCTOR  
COMPRESSED SULFUR DIOXIDE**

READ AND UNDERSTAND THE ENTIRE LABEL BEFORE USING THIS PRODUCT.

ACTIVE INGREDIENT: Sulfur Dioxide..... 100%

**KEEP OUT OF REACH OF CHILDREN**

**DANGER**  **PELIGRO**

**POISON**

PRECAUCION AL USUARIO: Si usted no lee ingles, no use este producto hasta que la etiqueta le haya sido explicado ampliamente.

**HARMFUL IF SWALLOWED. DO NOT SWALLOW OR INHALE.**

See label booklet for First Aid, Additional Precautionary Statements and Directions for Use including Storage and Disposal instructions.

**PRECAUTIONARY STATEMENTS**

**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

PRESSURIZED LIQUID GAS – HAZARDOUS VAPOR AND LIQUID –  
LIQUID CAUSES BURNS OF SKIN AND EYES.

Fatal if inhaled in high concentration. Do not breathe vapor. Persons with a history of respiratory problems should avoid exposure to the product. For handling activities in enclosed areas, use either a supplied-air respirator with NIOSH approval number prefix TC-19C, OR a self-contained breathing apparatus (SCBA) with NIOSH approval number TC-13F. Corrosive. Causes irreversible eye damage. Do not get in eyes or on clothing. Wear a full-face shield. Causes skin burns. Do not get in eyes, on skin, or on clothing. Wear long-sleeved shirt and long pants, and chemical resistant gloves and boots. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.

EPA REG. No. 11195-1

EPA EST. No. 11195-CA-1 or 2

Manufactured for:

**Snowden Enterprises, Inc., P.O. Box 751, Fresno, California 93712**

**Net Contents: (See Attached Tag for Pounds Sulfur Dioxide Net Contents)**

FIRST AID	
<b>If inhaled:</b>	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Trained personnel should administer oxygen as soon as possible.</li> <li>• Seek medical attention immediately.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>
<b>If on skin or clothing:</b>	<ul style="list-style-type: none"> <li>• Immediately flush contaminated skin with copious amounts of running water for at least 15 minutes. Continue as required to control burning sensation. Remove contaminated clothing while in shower to ensure irrigation of all contaminated skin.</li> <li>• DO NOT apply any chemicals or ointments/lotions to damaged skin.</li> <li>• Seek medical attention immediately. Call a poison control center or doctor for treatment advice.</li> </ul>
<b>If in eyes:</b>	<ul style="list-style-type: none"> <li>• DO NOT wear contact lenses when working with or around sulfur dioxide.</li> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes. Completely flush all eye and lid tissue.</li> <li>• DO NOT apply any chemical or ointment to the eyes.</li> <li>• Seek medical attention immediately. Call a poison control center or doctor for treatment advice.</li> </ul>
<b>If swallowed:</b>	<ul style="list-style-type: none"> <li>• (LIQUID SULFUR DIOXIDE)</li> <li>• Call a poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting.</li> <li>• Do not give anything to an unconscious person.</li> </ul>
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. In the event of a medical emergency, you may also contact the National Pesticide Information Center (NPIC) at 1-800-858-7378.	
<b>NOTE TO PHYSICIAN:</b> Probable mucosal damage may contraindicate the use of gastric lavage.	

**PRECAUTIONARY STATEMENTS**  
**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**  
**DANGER - PELIGRO**

PRESSURIZED LIQUID GAS – HAZARDOUS VAPOR AND LIQUID –  
LIQUID CAUSES BURNS OF SKIN AND EYES.

Fatal if inhaled in high concentration. Do not breathe vapor. Persons with a history of respiratory problems should avoid exposure to the product. For handling activities in enclosed areas, use either a supplied-air respirator with NIOSH approval number prefix TC-19C, OR a self-contained breathing apparatus (SCBA) with NIOSH approval number TC-13F. Corrosive. Causes irreversible eye damage. Do not get in eyes or on clothing. Wear a full-face shield. Causes skin burns. Do not get in eyes, on skin, or on clothing. Wear long-sleeved shirt and long pants, and chemical resistant gloves and boots. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.

Sulfur dioxide is an eye, nose, and throat irritant even at low levels. If tearing or upper respiratory tract irritation symptoms occur, leave fumigation area immediately.

Medical assessments of applicators and other persons who will be regularly exposed to sulfur dioxide should be conducted prior to employment and at 1 – 2 year intervals.



## **PERSONAL PROTECTIVE EQUIPMENT**

### **Protective Clothing**

Wear long-sleeved shirt and long pants, gloves and boots when handling this product. Until braided hoses are in place and connections have all been checked, wear a full-face mask when making gas applications.

If using non-braided hosing, wear full-body protective clothing impervious to sulfur dioxide, and gloves and boots that are impervious to sulfur dioxide. Wear goggles and SO<sub>2</sub> NIOSH/MSHA approved respirator when making SO<sub>2</sub> gas applications. Contact lenses should not be worn.

### **Respiratory Protection**

If the concentration of sulfur dioxide in the worker area, as measured by a pump and appropriate detector tubes, does not exceed 2.0 ppm, no respiratory protection is required. Examples of detectors are Draeger handpump and appropriate detector tube, Kitagawa or Sensidyne syringe type samplers with appropriate detector. The manufacturer's instructions provided with the measuring device should always be followed for the detector's correct use.

If the 2.0ppm concentration is exceeded at any time, all persons working in the fumigation area must wear a NIOSH/MSHA approved self-contained breathing apparatus (SCBA) or combination air supplied SCBA respirator. No one should enter a high SO<sub>2</sub> concentration area using a short-term full-face respirator because these only have a limited capacity for protection. It is not possible for someone working in a high SO<sub>2</sub> concentration area to know when the limit of a full-face respirator has been reached.

## **ENVIRONMENTAL HAZARDS**

This product is toxic to fish and wildlife. Do not spill or empty into streams, ponds or any other body of water. Do not contaminate water or wetlands by cleaning of equipment, disposal of wastes, or direct application.

## **PHYSICAL AND CHEMICAL HAZARDS**

Sulfur dioxide is a non-flammable, whitish colored gas of pungent odor. Corrosive in presence of water. Do not spray water on any leaking container. Water will make product corrosive and may increase venting. Sulfur dioxide can be sensed by taste at low level concentrations.

## **DIRECTIONS FOR USE** **RESTRICTED USE PESTICIDE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

This fumigant is a hazardous material and must be used only by individuals trained in its proper use. Before using, you must read and obey all label restrictions and directions.

All persons working with this fumigant must be knowledgeable about the hazards, and trained in the use of required respirator equipment and detector devices, emergency procedures, and proper use of the fumigant.

When used for fumigation of enclosed spaces (e.g., warehouses, cold storage rooms, trucks, van, boxcars, and other transport vehicles), it is important to follow requirements for applying Category I materials. It is Snowden Enterprises' recommendation that two persons trained in the use of this product be present at all times during introduction of the fumigant through the aeration period. It is recommended that any time SO<sub>2</sub> gassing is occurring, that the area be monitored for SO<sub>2</sub> levels at all times.

### **POSTING OF FUMIGATION SITES**

Before fumigation, the applicator must post markings at all entrances to the fumigated areas with signs bearing the following statements in English and Spanish:

1. The signal word DANGER/PELIGRO in 2" letters and the skull and crossbones symbol.
2. The statement, "Area under fumigation, DO NOT ENTER/NO ENTRE.
3. The date and time of fumigation.
4. Name of fumigant used.
5. Name, address, and telephone number of the applicator.

Any person who transfers a treated commodity to another site without aeration must ensure that the new site is posted until the air around the commodity is below the threshold concentration (2.0 ppm).

Remove posted marking sign(s) when the concentration of sulfur dioxide in the treated site is below 2.0 ppm as determined by use of a direct detection device.

#### **RE-ENTRY AFTER FUMIGATION**

After fumigation, treated areas must be undisturbed until the level of sulfur dioxide is at or below 2.0 ppm as determined by use of a direct detection device (such as Draeger hand pump and appropriate detector tube or Kitagawa or Sensidyne syringe detection device or an equivalent device). Do not allow entry into the treated area by any person before this time unless provided with a respiratory protection device (SCBA or combination air-supplied/SCBA respirator).

#### **COMMODITY FUMIGATION DIRECTIONS**

Follow all safety procedures specified on this label.

This product may be applied to the commodity in enclosed stationary spaces (fumigation, pre-cooling, or cold storage rooms). Applications may be made to the commodity in the following transport vehicles: trucks, vans, trailers, and railcars.

#### **Use Restrictions**

- Do not apply/aerate in a manner to allow drift onto areas occupied by unprotected humans or beneficial animals. Do not release fumigant into occupied work area.
- Do not apply so that liquid sulfur dioxide will come in contact with the fruit. Liquid sulfur dioxide on the fruit will cause bleaching of grapes. Enough fans should be operating in the fumigation space to volatilize all of the liquid sulfur dioxide and provide a uniform concentration throughout the room. It is recommended that an air volume of at least 0.5 times the volume of the fumigated space should be moved by the operating fans during each minute of gassing.

For the application, load the commodity to be fumigated into the treatment space. The lug boxes should be oriented such that the openings in each box are aligned with openings in the other boxes to promote airflow through the fruit in the boxes. Pallets of fruit should be stacked to promote airflow between them. Turn on circulating fans, close all vents, exhaust ports, and vents into the space. Vaporize the liquid sulfur dioxide by releasing the liquid SO<sub>2</sub> into the house hose system used for SO<sub>2</sub>. The hoses should be ducted into open spaces where air movement is unrestricted. If spraying in front of blower or fan equipment, be sure none is splashed onto the equipment or severe corrosion will result.

#### **GRAPES**

For post-harvest use only on grapes held in cold storage. To suppress spread of grey mold disease caused by *Botrytis cinerea*. The warehouse operator should work to minimize conditions that promote grey mold such as bruised or crushed berries, excess bunch shatter, etc.

#### **WAREHOUSE FUMIGATION AND STORAGE**

APPLICATION TIMING: SO<sub>2</sub> fumigation should occur as soon after harvest as is practical. For fruit to be stored for extended periods, initial gassing should occur on the day of harvest and follow on a 7-10 day interval. For fruit being shipped to market soon after harvest, SO<sub>2</sub> fumigation should be done before shipment, or in transit, if fruit has been gassed three (3) or fewer times. For fruit gassed in the warehouse more than three times, 12 or more hours should be allowed to elapse before shipment.

Seeded varieties may be fumigated on a 7-10 day interval up to 20 times. Most seedless varieties may be fumigated on a 7-10 day interval up to 15 times, but the Thompson Seedless variety should not be fumigated more than 12 times.

RATE OF APPLICATION: It is not a use inconsistent with this label to use less than recommended amounts, but it should be realized that using less than the stated rates may reduce efficacy.

INITIAL FUMIGATION: Use 3/4 to 1% gas concentration based on measured volume of the cold storage room or fumigation chamber.

**MAINTENANCE FUMIGATION:** Use 1/4 to 1/2% gas concentration based on measured volume of the cold storage room or fumigation chamber.

**TREATMENT TIME:** Gas treatment should last for 20-30 minutes starting when gas is initially introduced into the room. Fumigation should be terminated by venting the room or scrubbing the recirculated air. It is essential that venting be started at or before 30 minutes after gassing initiation or excess residue may result. When venting is initiated, vigorous air movement is required to either exhaust the SO<sub>2</sub> through a vent or vents on the roof, or through a water scrubber. Venting or scrubbing must draw all SO<sub>2</sub> saturated air from the spaces between the berries within the following 20-30 minutes. This requires complete air movement and air replacement in the room at the rate of at least 0.1 to 0.3 of the cubic volume of the room per minute for a duration of 20-30 minutes. Measurement of exhaust fan capacity should be periodically checked to maintain this or a greater air movement efficiency. If a water scrubber system is used, it is essential that sufficient scrubbing surface is available to remove the SO<sub>2</sub> from the recirculating air to equal the rate of removal by direct venting.

**APPLICATION – COLD STORAGE ROOM OR FUMIGATION CHAMBER:**

Obtain from Snowden Enterprises, Inc., or a designated distributor a pre-weighed filled cylinder that has been filled for a predesignated measured room (the filling weight is based on the room size).

Connect the bottle to a gassing system that has been previously evaluated and accepted by the chemical manufacturer for the designated room. When everything is ready for fumigation, open the valve and leave it open until the cylinder is empty. Close the valve and uncouple the cylinder from the system. Return the cylinder to a secure location properly labeled for Category 1 Pesticides. Return empty and/or partial cylinders only after consulting Snowden Enterprises, Inc., for proper shipping instructions.

**HIGH FREQUENCY – LOW DOSAGE TREATMENT - WAREHOUSE**

**APPLICATION TIMING:** SO<sub>2</sub> fumigation should occur as soon after harvest as is practical. For fruit to be stored for extended periods, initial gassing should occur on the day of harvest and follow at a three times per week interval (2 days, 2 days, 3 days). Seedless and seeded varieties may be fumigated on this high frequency, low dosage basis as long as they are in storage.

**INITIAL FUMIGATION:** Use 3/4 to 1% gas concentration based on the measured volume of the cold storage room.

**MAINTENANCE FUMIGATION:** Use 200 to 400 ppm gas concentration based on the measured volume of the cold storage room.

**TREATMENT TIME:** Gas treatment will last until the room concentration is determined by measurement to be below 2.0 ppm. Vigorous air movement is required during gassing and for approximately 30 minutes following gas introduction. No venting is required with this procedure.

**APPLICATION COLD STORAGE ROOM:** Obtain from Snowden Enterprises, Inc., or a designated distributor a pre-weighed, filled cylinder that has been filled for a predesignated measured room (the filling weight is based on the room size). Connect the cylinder to a previously validated gassing system installed in a designated room. When everything is ready for fumigation, open the valve and leave it open until the cylinder is empty. Close the valve and uncouple the cylinder from the system. Return the cylinder to a secure location properly labeled for Category 1 Pesticides. Return empty and/or partial cylinders only after consulting Snowden Enterprises, Inc., for proper shipping instructions.

**IN-HOUSE FOLLOW-UP PROCEDURE:** If you use this method, it is a requirement of this gassing method to examine your fruit for mold growth for the duration of cold storage. Fruit examination should occur at least once weekly.



**FUMIGATION OF GRAPES IN TRANSPORTATION VEHICLES (REFRIGERATOR TRUCKS, REFRIGERATED CONTAINERS, AND REFRIGERATED RAILCARS)**

**Use Restrictions:**

- Transportation vehicles fumigated with sulfur dioxide must be held for 24 hours and sulfur dioxide concentrations must be below 2 ppm before releasing for shipment.
- Ensure truck is on a level surface to prevent back flow of liquid sulfur dioxide through the floor drain.

**REFRIGERATED TRUCKS & CONTAINERS – FULL LOAD**

1. Attach 2 ft. poly-flo plastic to right or left pallet stringer. Use only Snowden provided plastic staples or Arrow T-25M Stapler with 9/16" staples. Hose MUST BE SECURE. Additional staples may be required.
2. Insert brass receptacle on rubber hose into end of poly-flo plastic securely.
3. Insert knurled end of hose down floor drain. Close doors.
4. Connect knurled end of hose finger tight to cylinder.
5. Turn cylinder upside down. Open slowly. Discharge completely (approximately 1 – 2 minutes).
6. When empty, close stem. Disconnect hose. Pull hose straight down from drain hole, releasing it from poly-flo plastic for reuse.

**REFRIGERATED TRUCKS & CONTAINERS – PARTIAL LOAD**

1. Close doors. Insert pipe up through drain hole.
2. Connect knurled end of hose finger tight to cylinder.
3. Turn cylinder upside down. Open slowly. Discharge completely (approximately 1 – 2 minutes).
4. When empty, close stem. Remove pipe from drain hole for reuse.

**REFRIGERATED RAILCAR**

1. Insert pipe into door opening at floor level. Close doors leaving hose outside.
2. Connect knurled end of hose finger tight to cylinder.
3. Turn cylinder upside down. Open slowly. Discharge completely (approximately 1 – 2 minutes).
4. When empty, close stem. Disconnect.
5. Remove pipe from doors.

**FOR USE IN CLEANING BARRELS USED IN WINE PRODUCTION** – Fumigate barrels to minimize effects of non-public health fungi and/or bacteria prior to the introduction of grape juice for wine production.

For wooden barrels used for wine aging:

1. Inside of barrels should be rinsed by a solvent selected by the winery (e.g. soap, water, etc.) and air dried.
2. Gas barrels - Using Gas Cylinder only (no education tube) and a barrel gassing unit with a pressure gauge provided by Snowden Enterprises. Pressure in the cylinder should be between 18-45 psi. Begin treatment by removing bung from barrel, insert SO<sub>2</sub> probe into the barrel and open the valve for 2-3 seconds. Now close the valve, extract the SO<sub>2</sub> probe and replace bung. Insert the SO<sub>2</sub> probe into the next barrel following the same procedure until all barrels are treated OR the pressure in the cylinder falls below 18 psi. If the cylinder pressure falls below 18 psi, change to another Gas Cylinder and continue gassing process as described.

NOTE TO USER: If a liquid SO<sub>2</sub> cylinder (with education tube) is used, the barrel will be damaged.

The SO<sub>2</sub> cylinders have fusible plugs (heat sensitive plugs) rated at 165°F. Do not expose cylinders to a heat source, including hot water. Doing so may rapidly release all of the SO<sub>2</sub> from the tank. If this happens, the work area should be evacuated until the air in the work area is shown to contain 2 ppm or less SO<sub>2</sub> or proper breathing apparatus is used.

After treatment, set cleaned barrels aside for 1-30 days. If barrels were gassed more than 30 days previously, they need to be re-gassed. When the barrels are being gassed, Draeger tube, or similar device readings must occasionally be made during gassing

process to assure that the SO<sub>2</sub> concentration in the gassing or work area does not exceed 2 ppm. If the work area readings are above 2 ppm, workers in the area must use NIOSH approved fitted face respirators for a short time or leave the work area until the atmosphere is shown to be at or below 2 ppm by an SO<sub>2</sub> detection device.

#### FUMIGATING CORKS USED IN WINE PRODUCTION

For corks used in wine production: Fumigate the cork to reduce effects of non-public health fungal or bacterial growth prior to corking bottles to minimize contamination of the wine in the bottle.

To fumigate cork bags, use a Gas Cylinder only (no reduction tube) and cork bag gassing unit equipped with or without a vacuum sealer. The Gas Cylinder and pressure gauge are provided by Snowden Enterprises or a designated distributor. Pressure in the cylinder should be between 18-45 psi. Begin treatment by placing a plastic bag into the cork loading equipment, fill the bag with corks, begin the heat sealing process, introduce SO<sub>2</sub> gas for 2-3 seconds, and complete the heat sealing process. If the cylinder pressure falls below 18 psi, change to another Gas Cylinder and continue the gassing process. Fumigated corks may be used the day following SO<sub>2</sub> gassing. Any bags thus treated must be labeled as "SO<sub>2</sub> treated".

#### STORAGE AND DISPOSAL, SPILL AND LEAK PROCEDURES

### **STORAGE AND DISPOSAL**

Do not contaminate water, food, or feed by storage or disposal.

**Pesticide Storage** – Store in a secure location properly labeled for Category I pesticides. Store cylinders upright, secured to a rack or wall or placed in specially designed cases to prevent tipping. Cylinders should not be subjected to rough handling or mechanical shock such as dropping, bumping, dragging, or sliding. Do not use rope slings, hooks, tongs, or similar devices to unload cylinders. Do not store near flammable material, near the inlet of a ventilating or air conditioning unit, near any source of direct heat, nor in a subsurface location. Before use, locate the bottle labeled for the room to be fumigated, which will show the room number and weight of SO<sub>2</sub> in the container, move this container to the room matched to the container for fumigation. Do not remove bonnet or safety cap protecting valve before use. Replace bonnet or safety cap when not in use.

**Pesticide Disposal** – Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of according to label instruction, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

**Container Handling** - Refillable container. Refill this container with sulfur dioxide only. Do not reuse this container for any other purpose. When cylinder is empty after use, close valve by turning to the right until tight, disconnect lines and replace protection bonnet before returning to supplier. Do not use cylinders for any other purpose. Only Snowden Enterprises, Inc. is authorized to refill cylinders. After cylinder is empty and the valves are closed and uncoupled from the system, return cylinder to a secure location properly labeled for Category 1 Pesticides. Return empty and/or partial cylinders only after consulting Snowden Enterprises, Inc., for proper shipping instructions.

**Spill and Leak Procedures** – Evacuate immediate area of spill or leak. Use a NIOSH/MSHA approved self-contained breathing apparatus (SCBA) or combination air supplied/SCBA respirator for entry into affected area to correct problem. Move leaking or damaged cylinders outdoors or to an isolated location, observing strict safety precautions. Work upwind if possible. Allow spill to evaporate. Do not permit entry into spill area by unprotected persons until concentration of sulfur dioxide is determined to be less than 2.0 ppm as determined by use of a direct detection device.

#### CONDITIONS OF SALE

1. Snowden Enterprises, Inc. warrants that this product consists of the ingredients specified and is reasonably fit for the purpose stated on this label when used in accordance with the directions under normal conditions of use. No one other than an officer of Snowden is authorized (and such authorization must be in writing) to make any other warranty, guarantee or direction concerning this product.

2. Because the time, place, rate of application, weather conditions and normal or abnormal conditions of use or storage are beyond Snowden's control, to the extent consistent with applicable law, Snowden's liability is limited to replacement of product or refund of purchase price. In no event shall Snowden be liable for indirect or consequential damages.



**RESTRICTED USE PESTICIDE**

Due to corrosive effects during inhalation and to eyes and skin. For retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's Certifications.

**THE FRUIT DOCTOR  
COMPRESSED SULFUR DIOXIDE**

READ AND UNDERSTAND THE ENTIRE LABEL BEFORE USING THIS PRODUCT.

ACTIVE INGREDIENT: Sulfur Dioxide..... 100%

**KEEP OUT OF REACH OF CHILDREN**

**DANGER**  **PELIGRO**

**POISON**

PRECAUCION AL USUARIO: Si usted no lee ingles, no use este producto hasta que la etiqueta le haya sido explicado ampliamente.

**HARMFUL IF SWALLOWED. DO NOT SWALLOW OR INHALE.**

See label booklet for First Aid, Additional Precautionary Statements and Directions for Use including Storage and Disposal instructions.

**PRECAUTIONARY STATEMENTS**

**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

PRESSURIZED LIQUID GAS - HAZARDOUS VAPOR AND LIQUID -  
LIQUID CAUSES BURNS OF SKIN AND EYES.

Fatal if inhaled in high concentration. Do not breathe vapor. Persons with a history of respiratory problems should avoid exposure to the product. For handling activities in enclosed areas, use either a supplied-air respirator with NIOSH approval number prefix TC-19C, OR a self-contained breathing apparatus (SCBA) with NIOSH approval number TC-13F. Corrosive. Causes irreversible eye damage. Do not get in eyes or on clothing. Wear a full-face shield. Causes skin burns. Do not get in eyes, on skin, or on clothing. Wear long-sleeved shirt and long pants, and chemical resistant gloves and boots. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.

EPA REG. No. 11195-1

EPA EST. No. 11195-CA-1 or 2

Manufactured for:

**Snowden Enterprises, Inc.**, P.O. Box 751, Fresno, California 93712

**Net Contents: (See Attached Tag for Pounds Sulfur Dioxide Net Contents)**

PEEL HERE TO OPEN ▲

# *Snowden* ENTERPRISES Inc.

MAIN OFFICE:  
P.O. BOX 751, FRESNO, CALIFORNIA 93712-0751  
PHONE (559) 237-5546, FAX (559) 237-6383

MODESTO OFFICE:  
P.O. BOX 3309, MODESTO, CALIFORNIA 95353-3309  
PHONE (209) 522-5215, FAX (209) 522-4136

October 15, 2012

To Whom It May Concern:

RE: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Pyxis Regulatory Consulting, Inc. is authorized to act as agents for Snowden Enterprises, Inc. (EPA Company Number 11195), before the U.S. Environmental Protection Agency and state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

If you have any questions, please do not hesitate to contact me.

Sincerely,



Kirk Shermer  
President

Cc: Pyxis Regulatory Consulting, Inc.

55



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

April 1, 2016

Mike Kellogg  
Agent for Snowden Enterprises, Inc.  
Snowden Enterprises, Inc.  
c/o Pyxis Regulatory Consulting  
4110 136<sup>th</sup> St. Consulting, Inc.  
Gig Harbor, WA 98332

Subject: Label Amendment – Adding language to precautionary statements section  
Product Name: The Fruit Doctor/Compressed Sulfur Dioxide  
EPA Registration Number: 11195-1  
Application Date: 03/17/2016  
Decision Number: 515258

Dear Mr. Kellogg:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance



Page 2 of 2  
EPA Reg. No. 11195-1  
Decision No. 515258

with FIFRA section 6. If you have any questions, please contact Lisa Pahel by phone at (703) 347-0459, or via email at [pahel.lisa@epa.gov](mailto:pahel.lisa@epa.gov).

Sincerely,

A handwritten signature in cursive script that reads "Heather Garvie".

Heather Garvie, Product Manager 24  
Fungicide and Herbicide  
Registration Division (7505P)  
Office of Pesticide Programs

Enclosure

Explore Registrations				
Reg Number:	11195-1	Reg. Type: Product Registration - Section 3	Status:	Conditionally Registered (17-Jul-199)
Name: THE FRUIT DOCTOR/COMPRESSED SULFUR DIOXIDE			<View Registration Details>	
(No New Receipts)				
S:	Submission Type	OPP Rec'd Date	Resubmission	Description
<div style="display: flex;"> <div style="flex: 1;"> <p>Decisions...</p> <ul style="list-style-type: none"> <li>D: Pending; 515258; 11195-1;300;LABEL REVISION;N</li> <li>75-Day Letters</li> <li><b>S: 983206 3/17/2016; Amendment; 11195</b></li> <li>D: Closed; 514594; 11195-1;300;LABEL REVISION;N</li> <li>D: Closed; 508113; 11195-1;300;LABEL REVISION;N</li> <li>D: Closed; 471800; 11195-1;332;NOTIFICATION;</li> <li>D: Closed; 421602; 11195-1;360;ACTION INITIATED</li> <li>D: Closed; 391277; 11195-1;300;LABEL REVISION;N</li> <li>D: Pending; 386248; 11195-1;676;Product Reregistrati</li> <li>D: Closed; 347801; 11195-1;300;LABEL REVISION;N</li> <li>D: Closed; 347728; 11195-1;W01;ULTRA SMALL BUS</li> <li>D: Closed; 347005; 11195-1;V12;FEE REDUCTION (1</li> <li>D: Closed; 290220; 11195-1;R17;NEW USE;EACH AL</li> <li>D: Closed; 290219; 11195-1;350;GENERAL CORRES</li> <li>D: Pending; 290218; 11195-1;320;DATA REQUIRED;I</li> <li>D: Closed; 290217; 11195-1;160;NEW REGISTRATIC</li> <li>Data Requirements</li> </ul> </div> <div style="flex: 2;"> <p>S: 983206    Reg #: 11195-1</p> <p>Submission Type: Amendment</p> <p>Resubmission?: <input type="radio"/> Yes <input checked="" type="radio"/> No    E-Sub #:</p> <p>Decision #: 515258; 300;LABEL REVISION;NO DATA REQUIRED;</p> <p>Submitter Company: SNOWDEN ENTERPRISES, INC</p> <p>Application Date: 17-Mar-2016</p> <p>OPP Received Date: 17-Mar-2016    Date Sent to Risk manager: 21-Mar-2016</p> <p>Studies Included?: <input type="radio"/> Yes <input checked="" type="radio"/> No    Fast Track?: <input checked="" type="radio"/> Yes <input type="radio"/> No</p> <p>Form A Signed?: <input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> None    Date: </p> <p>Form B Signed?: <input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> None    Date: </p> <p>Reviewer: Pahel, Lisa</p> <p>Received DT:    Editable Due DT: </p> <p>Submission Due DT: 15-Jun-2016    Response: 0 , 17-Mar-2016</p> <p>Priority Weight:    Priority Points: </p> <p>Comments: FTA/ response to agency correspondence of 3/17/16 (3/28/16 et)</p> <p style="text-align: right;">MAR 30 2016 <i>et</i></p> </div> </div>				

Decision letter sent 3/31

S: 983206

Milestone Email: Mike@PyxisRC.com

Regulatory Type: Product Registration - Section 3

Resubmission: ☐ Yes ☒ No

Application Type: Amendment

Fee For Service: ☐ Yes ☒ No

Billable: ☐ Yes ☒ No

Company: 11195 SNOWDEN ENTERPRISES, INC

V

Print Letter

Enter More Information

Tracking

Risk Manager: Registration Division, Risk Management Team 24

Product #: 11195-1

Product Name: THE FRUIT DOCTOR/COMPRESSED SULFUF

Override#:

Me Too

Section3:

Me Too Product

Name:

Application Date: 17-Mar-2016



OPP Rec'd Date: 17-Mar-2016



Front End Date: 18-Mar-2016



Risk Manager Send Date: 21-Mar-2016



FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐

New Ingredient: ☐

Receipt Description:

E-portal pkg# 10593. Fast track amendment in response to Agency letter dated 3-7-16

Receipt Content

Des

Electronic Label

View/Edit

Form A: ☐

Signature Date:

Form B: ☐

Signature Date:





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

March 21, 2016

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

JANELLE KAY  
PYXIS REGULATORY CONSULTING, INC.  
SNOWDEN ENTERPRISES, INC  
4110 136TH STREET CT NW  
GIG HARBOR, WA 98332-

PRODUCT NAME: THE FRUIT DOCTOR/COMPRESSED SULFUR DIOXIDE  
COMPANY NAME: SNOWDEN ENTERPRISES, INC  
OPP IDENTIFICATION NUMBER:  
EPA FILE SYMBOL: 11195-1  
EPA RECEIPT DATE: 03/17/16

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 24, at (703) 308-0034.

Sincerely,

A handwritten signature in black ink, appearing to be "S. End Processing Staff", is written over the word "Sincerely,".

Front End Processing Staff  
Information Services Branch  
Information Technology & Resources Management Division

PYXIS REGULATORY CONSULTING, INC.

4110 136<sup>th</sup> St. Ct. NW  
Gig Harbor, WA 98332

Phone: 253-853-7369  
Fax: 253-853-5516  
Mike@PyxisRC.com

March 17, 2016

ELECTRONIC DELIVERY

Heather Garvie (PM 24)  
Document Processing Desk (**AMEND**)  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202-4501

RE: Snowden Enterprises, Inc. – The Fruit Doctor/Compressed Sulfur Dioxide  
(EPA Reg. No. 11195-1)  
Submission of a Non-PRIA Fast Track Label Amendment in Response to Agency  
Correspondence of March 17, 2016

Dear Ms. Garvie,

On behalf of Snowden Enterprises, Inc., and in response to your email of March 17, 2016 please find the enclosed label amendment to The Fruit Doctor/Compressed Sulfur Dioxide (EPA Reg. No. 11195-1) label.

Pursuant to your email, the following language is being added to the Precautionary Statements section on the large cylinder base label:

Sulfur dioxide is an eye, nose, and throat irritant even at low levels. If tearing or upper respiratory tract irritation symptoms occur, leave fumigation area immediately.

Medical assessments of applicators and other persons who will be regularly exposed to sulfur dioxide should be conducted prior to employment and at 1 – 2 year intervals.

In support of this label amendment, please find the enclosed documents:

1. Completed Application for Registration (EPA Form 8570-1)
2. One (1) copy of The Fruit Doctor/Compressed Sulfur Dioxide labeling with changes tracked
3. One (1) copy of The Fruit Doctor/Compressed Sulfur Dioxide labeling with changes incorporated
4. Letter of Authorization

Snowden Enterprises, Inc. believes this amendment application qualifies as a non-PRIA fast track amendment as no data are being submitted nor will data need to be reviewed to approve the proposed label. Please feel free to contact me by email (Mike@PyxisRC.com) or by phone at (253) 853-7369 if you have any questions or need any additional information.

Sincerely,



Michael Kellogg

Enclosures

cc: K. Shermer; Snowden Enterprises, Inc.

**DOCUMENTUM**





United States  
Environmental Protection Agency  
Washington, DC 20460

☐  
☒  
☐

Registration  
Amendment  
Other

OPP Identifier Number

## Application for Pesticide - Section I

1. Company/Product Number 11195-1	2. EPA Product Manager H. Garvie	3. Proposed Classification <input type="checkbox"/> None <input checked="" type="checkbox"/> Restricted
4. Company/Product (Name) Snowden Enterprises, Inc./The Fruit Doctor/Compressed Sulfur Dioxide	PM# 24	
5. Name and Address of Applicant (Include ZIP Code) Snowden Enterprises, Inc. c/o Pyxis Regulatory Consulting, Inc. 4110 136th St. Ct. NW Gig Harbor, WA 98332 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

## Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input checked="" type="checkbox"/> Resubmission in response to Agency letter dated 3/17/16	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of a non-PRIA fast track label amendment in response to Agency correspondence of March 17, 2016. As no data are being submitted with this amendment, nor will data need to be reviewed to approve the proposed labeling, Snowden Enterprises, Inc. believes this action qualifies as a Fast Track amendment and is not subject to a Pesticide Registration Service Fee. Please feel free to contact me by phone (253) 853-7369 or by email at Mike@PyxisRC.com if you have any questions or need any additional information.

## Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal	
				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	Gas cylinder
* Certification must be submitted				Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input checked="" type="checkbox"/> Container		4. Size(s) Retail Container 0.5-150 lbs.		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

## Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Michael Kellogg		Title Agent		Telephone No. (Include Area Code) (253)-853-7369	
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature 		3. Title Agent			
4. Typed Name Michael Kellogg		5. Date March 17, 2016			

DOCUMENTUM



# RESTRICTED USE PESTICIDE

Due to corrosive effects during inhalation and to eyes and skin.

For retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's Certifications.

## THE FRUIT DOCTOR

COMPRESSED SULFUR DIOXIDE  
READ AND UNDERSTAND THE  
ENTIRE LABEL BEFORE USING THIS PRODUCT.

**ACCEPTED**

04/01/2016

Under the Federal Insecticide, Fungicide  
and Rodenticide Act as amended, for the  
pesticide registered under  
EPA Reg. No. 11195-1

ACTIVE INGREDIENT: Sulfur Dioxide..... 100%

**KEEP OUT OF REACH OF CHILDREN**

**DANGER**



**PELIGRO**

**POISON**

PRECAUCION AL USUARIO: Si usted no lee ingles, no use este producto hasta que la etiqueta le haya sido explicado ampliamente.

**HARMFUL IF SWALLOWED. DO NOT SWALLOW OR INHALE.**

See inside label booklet for additional Precautionary Statements and Directions for Use including Storage and Disposal instructions.

### FIRST AID

<b>If inhaled</b>	<ul style="list-style-type: none"><li>– Move person to fresh air.</li><li>– If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Trained personnel should administer oxygen as soon as possible.</li><li>– Seek medical attention immediately.</li><li>– Call a poison control center or doctor for further treatment advice.</li></ul>
<b>If on skin or clothing:</b>	<ul style="list-style-type: none"><li>– Immediately flush contaminated skin with copious amounts of running water for at least 15 minutes. Continue as required to control burning sensation. Remove contaminated clothing while in shower to ensure irrigation of all contaminated skin.</li><li>– DO NOT apply any chemicals or ointments/lotions to damaged skin.</li><li>– Seek medical attention immediately. Call a poison control center or doctor for treatment advice.</li></ul>
<b>If in eyes:</b>	<ul style="list-style-type: none"><li>– DO NOT wear contact lenses when working with or around sulfur dioxide.</li><li>– Hold eye open and rinse slowly and gently with water for 15-20 minutes. Completely flush all eye and lid tissue.</li><li>– DO NOT apply any chemical or ointment to the eyes.</li><li>– Seek medical attention immediately. Call a poison control center or doctor for treatment advice.</li></ul>
<b>If swallowed:</b>	<ul style="list-style-type: none"><li>– (LIQUID SULFUR DIOXIDE)</li><li>– Call a poison control center or doctor immediately for treatment advice.</li><li>– Have person sip a glass of water if able to swallow.</li><li>– Do not induce vomiting.</li><li>– Do not give anything to an unconscious person.</li></ul>

### HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. In the event of a medical emergency, you may also contact the National Pesticide Information Center (NPIC) at 1-800-858-7378.

**NOTE TO PHYSICIAN:** Probable mucosal damage may contraindicate the use of gastric lavage.

EPA REG. No. 11195-1

EPA EST. No. 11195-CA-1 or 2

Manufactured for: **Snowden Enterprises, Inc.**, P.O. Box 751, Fresno, California 93712

Net Contents: (See Attached Tag for Pounds Sulfur Dioxide Net Contents)

**PRECAUTIONARY STATEMENTS**  
**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**  
**DANGER - PELIGRO**

**PRESSURIZED LIQUID GAS – HAZARDOUS VAPOR AND LIQUID –  
LIQUID CAUSES BURNS OF SKIN AND EYES.**

Fatal if inhaled in high concentration. Do not breathe vapor. Persons with a history of respiratory problems should avoid exposure to the product. For handling activities in enclosed areas, use either a supplied-air respirator with NIOSH approval number prefix TC-19C, OR a self-contained breathing apparatus (SCBA) with NIOSH approval number TC-13F. Corrosive. Causes irreversible eye damage. Do not get in eyes or on clothing. Wear a full-face shield. Causes skin burns. Do not get in eyes, on skin, or on clothing. Wear long-sleeved shirt and long pants, and chemical resistant gloves and boots. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.

Sulfur dioxide is an eye, nose, and throat irritant even at low levels. If tearing or upper respiratory tract irritation symptoms occur, leave fumigation area immediately.

Medical assessments of applicators and other persons who will be regularly exposed to sulfur dioxide should be conducted prior to employment and at 1 – 2 year intervals.

**PERSONAL PROTECTIVE EQUIPMENT**

**Protective Clothing**

Wear long-sleeved shirt and long pants, gloves and boots when handling this product. Until braided hoses are in place and connections have all been checked, wear a full-face mask when making gas applications.

If using non-braided hosing, wear full-body protective clothing impervious to sulfur dioxide, and gloves and boots that are impervious to sulfur dioxide. Wear goggles and SO<sub>2</sub> NIOSH/MSHA approved respirator when making SO<sub>2</sub> gas applications. Contact lenses should not be worn.

**Respiratory Protection**

If the concentration of sulfur dioxide in the worker area, as measured by a pump and appropriate detector tubes, does not exceed 2.0 ppm, no respiratory protection is required. Examples of detectors are Draeger handpump and appropriate detector tube, Kitagawa or Sensidyne syringe type samplers with appropriate detector. The manufacturer's instructions provided with the measuring device should always be followed for the detector's correct use.

If the 2.0 ppm concentration is exceeded at any time, all persons working in the fumigation area must wear a NIOSH/MSHA approved self-contained breathing apparatus (SCBA) or combination air supplied SCBA respirator. No one should enter a high SO<sub>2</sub>

concentration area using a short-term full-face respirator because these only have a limited capacity for protection. It is not possible for someone working in a high SO<sub>2</sub> concentration area to know when the limit of a full-face respirator has been reached.

#### **ENVIRONMENTAL HAZARDS**

This product is toxic to fish and wildlife. Do not spill or empty into streams, ponds or any other body of water. Do not contaminate water or wetlands by cleaning of equipment, disposal of wastes, or direct application.

#### **PHYSICAL AND CHEMICAL HAZARDS**

Sulfur dioxide is a non-flammable, whitish colored gas of pungent odor. Corrosive in presence of water. Do not spray water on any leaking container. Water will make product corrosive and may increase venting. Sulfur dioxide can be sensed by taste at low level concentrations.



## **DIRECTIONS FOR USE RESTRICTED USE PESTICIDE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

This fumigant is a hazardous material and must be used only by individuals trained in its proper use. Before using, you must read and obey all label restrictions and directions.

All persons working with this fumigant must be knowledgeable about the hazards, and trained in the use of required respirator equipment and detector devices, emergency procedures, and proper use of the fumigant.

When used for fumigation of enclosed spaces (e.g., warehouses, cold storage rooms, trucks, van, boxcars, and other transport vehicles), it is important to follow requirements for applying Category I materials. It is Snowden Enterprises' recommendation that two persons trained in the use of this product be present at all times during introduction of the fumigant through the aeration period. It is recommended that any time SO<sub>2</sub> gassing is occurring, that the area be monitored for SO<sub>2</sub> levels at all times.

### POSTING OF FUMIGATION SITES

Before fumigation, the applicator must post markings at all entrances to the fumigated areas with signs bearing the following statements in English and Spanish:

1. The signal word DANGER/PELIGRO in 2" letters and the skull and crossbones symbol.
2. The statement, "Area under fumigation, DO NOT ENTER/NO ENTRE.
3. The date and time of fumigation.
4. Name of fumigant used.
5. Name, address, and telephone number of the applicator.

Any person who transfers a treated commodity to another site without aeration must ensure that the new site is posted until the air around the commodity is below the threshold concentration (2.0 ppm).

Remove posted marking sign(s) when the concentration of sulfur dioxide in the treated site is below 2.0 ppm as determined by use of a direct detection device.

### RE-ENTRY AFTER FUMIGATION

After fumigation, treated areas must be undisturbed until the level of sulfur dioxide is at or below 2.0 ppm as determined by use of a direct detection device (such as Draeger hand pump and appropriate detector tube or Kitagawa or Sensidyne syringe detection device or an equivalent device). Do not allow entry into the treated area by any person before this

time unless provided with a respiratory protection device (SCBA or combination air-supplied/SCBA respirator).

### COMMODITY FUMIGATION DIRECTIONS

Follow all safety procedures specified on this label.

This product may be applied to the commodity in enclosed stationary spaces (fumigation, pre-cooling, or cold storage rooms). Applications may be made to the commodity in the following transport vehicles: trucks, vans, trailers, and railcars.

#### **Use Restrictions**

- Do not apply/aerate in a manner to allow drift onto areas occupied by unprotected humans or beneficial animals. Do not release fumigant into occupied work area.
- Do not apply so that liquid sulfur dioxide will come in contact with the fruit. Liquid sulfur dioxide on the fruit will cause bleaching of grapes. Enough fans should be operating in the fumigation space to volatilize all of the liquid sulfur dioxide and provide a uniform concentration throughout the room. It is recommended that an air volume of at least 0.5 times the volume of the fumigated space should be moved by the operating fans during each minute of gassing.

For the application, load the commodity to be fumigated into the treatment space. The lug boxes should be oriented such that the openings in each box are aligned with openings in the other boxes to promote airflow through the fruit in the boxes. Pallets of fruit should be stacked to promote airflow between them. Turn on circulating fans, close all vents, exhaust ports, and vents into the space. Vaporize the liquid sulfur dioxide by releasing the liquid  $\text{SO}_2$  into the house hose system used for  $\text{SO}_2$ . The hoses should be ducted into open spaces where air movement is unrestricted. If spraying in front of blower or fan equipment, be sure none is splashed onto the equipment or severe corrosion will result.

#### **GRAPES**

For post-harvest use only on grapes held in cold storage. To suppress spread of grey mold disease caused by *Botrytis cinerea*. The warehouse operator should work to minimize conditions that promote grey mold such as bruised or crushed berries, excess bunch shatter, etc.

### WAREHOUSE FUMIGATION AND STORAGE

APPLICATION TIMING:  $\text{SO}_2$  fumigation should occur as soon after harvest as is practical. For fruit to be stored for extended periods, initial gassing should occur on the day of harvest and follow on a 7-10 day interval. For fruit being shipped to market soon after harvest,  $\text{SO}_2$  fumigation should be done before shipment, or in transit, if fruit has



been gassed three (3) or fewer times. For fruit gassed in the warehouse more than three times, 12 or more hours should be allowed to elapse before shipment.

Seeded varieties may be fumigated on a 7-10 day interval up to 20 times. Most seedless varieties may be fumigated on a 7-10 day interval up to 15 times, but the Thompson Seedless variety should not be fumigated more than 12 times.

**RATE OF APPLICATION:** It is not a use inconsistent with this label to use less than recommended amounts, but it should be realized that using less than the stated rates may reduce efficacy.

**INITIAL FUMIGATION:** Use  $\frac{3}{4}$  to 1% gas concentration based on measured volume of the cold storage room or fumigation chamber.

**MAINTENANCE FUMIGATION:** Use  $\frac{1}{4}$  to  $\frac{1}{2}$ % gas concentration based on measured volume of the cold storage room or fumigation chamber.

**TREATMENT TIME:** Gas treatment should last for 20-30 minutes starting when gas is initially introduced into the room. Fumigation should be terminated by venting the room or scrubbing the recirculated air. It is essential that venting be started at or before 30 minutes after gassing initiation or excess residue may result. When venting is initiated, vigorous air movement is required to either exhaust the  $\text{SO}_2$  through a vent or vents on the roof, or through a water scrubber. Venting or scrubbing must draw all  $\text{SO}_2$  saturated air from the spaces between the berries within the following 20-30 minutes. This requires complete air movement and air replacement in the room at the rate of at least 0.1 to 0.3 of the cubic volume of the room per minute for a duration of 20-30 minutes. Measurement of exhaust fan capacity should be periodically checked to maintain this or a greater air movement efficiency. If a water scrubber system is used, it is essential that sufficient scrubbing surface is available to remove the  $\text{SO}_2$  from the recirculating air to equal the rate of removal by direct venting.

**APPLICATION – COLD STORAGE ROOM OR FUMIGATION CHAMBER:**

Obtain from Snowden Enterprises, Inc., or a designated distributor a pre-weighed filled cylinder that has been filled for a predesignated measured room (the filling weight is based on the room size).

Connect the bottle to a gassing system that has been previously evaluated and accepted by the chemical manufacturer for the designated room. When everything is ready for fumigation, open the valve and leave it open until the cylinder is empty. Close the valve and uncouple the cylinder from the system. Return the cylinder to a secure location properly labeled for Category 1 Pesticides. Return empty and/or partial cylinders only after consulting Snowden Enterprises, Inc., for proper shipping instructions.



## HIGH FREQUENCY – LOW DOSAGE TREATMENT - WAREHOUSE

**APPLICATION TIMING:** SO<sub>2</sub> fumigation should occur as soon after harvest as is practical. For fruit to be stored for extended periods, initial gassing should occur on the day of harvest and follow at a three times per week interval (2 days, 2 days, 3 days). Seedless and seeded varieties may be fumigated on this high frequency, low dosage basis as long as they are in storage.

**INITIAL FUMIGATION:** Use  $\frac{3}{4}$  to 1% gas concentration based on the measured volume of the cold storage room.

**MAINTENANCE FUMIGATION:** Use 200 to 400 ppm gas concentration based on the measured volume of the cold storage room.

**TREATMENT TIME:** Gas treatment will last until the room concentration is determined by measurement to be below 2.0 ppm. Vigorous air movement is required during gassing and for approximately 30 minutes following gas introduction. No venting is required with this procedure.

**APPLICATION COLD STORAGE ROOM:** Obtain from Snowden Enterprises, Inc., or a designated distributor a pre-weighed, filled cylinder that has been filled for a predesignated measured room (the filling weight is based on the room size). Connect the cylinder to a previously validated gassing system installed in a designated room. When everything is ready for fumigation, open the valve and leave it open until the cylinder is empty. Close the valve and uncouple the cylinder from the system. Return the cylinder to a secure location properly labeled for Category 1 Pesticides. Return empty and/or partial cylinders only after consulting Snowden Enterprises, Inc., for proper shipping instructions.

**IN-HOUSE FOLLOW-UP PROCEDURE:** If you use this method, it is a requirement of this gassing method to examine your fruit for mold growth for the duration of cold storage. Fruit examination should occur at least once weekly.

## FUMIGATION OF GRAPES IN TRANSPORTATION VEHICLES (REFRIGERATOR TRUCKS, REFRIGERATED CONTAINERS, AND REFRIGERATED RAILCARS)

Use Restrictions:

- Transportation vehicles fumigated with sulfur dioxide must be held for 24 hours and sulfur dioxide concentrations must be below 2 ppm before releasing for shipment.
- Ensure truck is on a level surface to prevent back flow of liquid sulfur dioxide through the floor drain.

#### REFRIGERATED TRUCKS & CONTAINERS – FULL LOAD

1. Attach 2 ft. poly-flo plastic to right or left pallet stringer. Use only Snowden provided plastic staples or Arrow T-25M Stapler with 9/16” staples. Hose **MUST BE SECURE**. Additional staples may be required.
2. Insert brass receptacle on rubber hose into end of poly-flo plastic securely.
3. Insert knurled end of hose down floor drain. Close doors.
4. Connect knurled end of hose finger tight to cylinder.
5. Turn cylinder upside down. Open slowly. Discharge completely (approximately 1 – 2 minutes).
6. When empty, close stem. Disconnect hose. Pull hose straight down from drain hole, releasing it from poly-flo plastic for reuse.

#### REFRIGERATED TRUCKS & CONTAINERS – PARTIAL LOAD

1. Close doors. Insert pipe up through drain hole.
2. Connect knurled end of hose finger tight to cylinder.
3. Turn cylinder upside down. Open slowly. Discharge completely (approximately 1 – 2 minutes).
4. When empty, close stem. Remove pipe from drain hole for reuse.

#### REFRIGERATED RAILCAR

1. Insert pipe into door opening at floor level. Close doors leaving hose outside.
2. Connect knurled end of hose finger tight to cylinder.
3. Turn cylinder upside down. Open slowly. Discharge completely (approximately 1 – 2 minutes).
4. When empty, close stem. Disconnect.
5. Remove pipe from doors.

FOR USE IN CLEANING BARRELS USED IN WINE PRODUCTION – Fumigate barrels to minimize effects of non-public health fungi and/or bacteria prior to the introduction of grape juice for wine production.

For wooden barrels used for wine aging:

1. Inside of barrels should be rinsed by a solvent selected by the winery (e.g. soap, water, etc.) and air dried.
2. Gas barrels - Using Gas Cylinder only (no education tube) and a barrel gassing unit with a pressure gauge provided by Snowden Enterprises. Pressure in the cylinder should be between 18-45 psi. Begin treatment by removing bung from barrel, insert SO<sub>2</sub> probe into the barrel and open the valve for 2-3 seconds. Now close the valve, extract the SO<sub>2</sub> probe and replace bung. Insert the SO<sub>2</sub> probe into the next barrel following the same procedure until all barrels are treated OR the pressure in the cylinder falls below 18 psi. If the cylinder pressure falls below 18 psi, change to another Gas Cylinder and continue gassing process as described.

NOTE TO USER: If a liquid SO<sub>2</sub> cylinder (with education tube) is used, the barrel will be damaged.

The SO<sub>2</sub> cylinders have fusible plugs (heat sensitive plugs) rated at 165°F. Do not expose cylinders to a heat source, including hot water. Doing so may rapidly release all of the SO<sub>2</sub> from the tank. If this happens, the work area should be evacuated until the air in the work area is shown to contain 2 ppm or less SO<sub>2</sub> or proper breathing apparatus is used.

After treatment, set cleaned barrels aside for 1-30 days. If barrels were gassed more than 30 days previously, they need to be re-gassed. When the barrels are being gassed, Draeger tube, or similar device readings must occasionally be made during gassing process to assure that the SO<sub>2</sub> concentration in the gassing or work area does not exceed 2 ppm. If the work area readings are above 2 ppm, workers in the area must use NIOSH approved fitted face respirators for a short time or leave the work area until the atmosphere is shown to be at or below 2 ppm by an SO<sub>2</sub> detection device.



## FUMIGATING CORKS USED IN WINE PRODUCTION

For corks used in wine production: Fumigate the cork to reduce effects of non-public health fungal or bacterial growth prior to corking bottles to minimize contamination of the wine in the bottle.

To fumigate cork bags, use a Gas Cylinder only (no education tube) and cork bag gassing unit equipped with or without a vacuum sealer. The Gas Cylinder and pressure gauge are provided by Snowden Enterprises or a designated distributor. Pressure in the cylinder should be between 18-45 psi. Begin treatment by placing a plastic bag into the cork loading equipment, fill the bag with corks, begin the heat sealing process, introduce SO<sub>2</sub> gas for 2-3 seconds, and complete the heat sealing process. If the cylinder pressure falls below 18 psi, change to another Gas Cylinder and continue the gassing process. Fumigated corks may be used the day following SO<sub>2</sub> gassing. Any bags thus treated must be labeled as "SO<sub>2</sub> treated".

## STORAGE AND DISPOSAL, SPILL AND LEAK PROCEDURES

### **STORAGE AND DISPOSAL**

Do not contaminate water, food, or feed by storage or disposal.

**Pesticide Storage** – Store in a secure location properly labeled for Category I pesticides. Store cylinders upright, secured to a rack or wall or placed in specially designed cases to prevent tipping. Cylinders should not be subjected to rough handling or mechanical shock such as dropping, bumping, dragging, or sliding. Do not use rope slings, hooks, tongs, or similar devices to unload cylinders. Do not store near flammable material, near the inlet of a ventilating or air conditioning unit, near any source of direct heat, nor in a subsurface location. Before use, locate the bottle labeled for the room to be fumigated, which will show the room number and weight of SO<sub>2</sub> in the container, move this container to the room matched to the container for fumigation. Do not remove bonnet or safety cap protecting valve before use. Replace bonnet or safety cap when not in use.

**Pesticide Disposal** – Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of according to label instruction, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

**Container Handling** - Refillable container. Refill this container with sulfur dioxide only. Do not reuse this container for any other purpose. When cylinder is empty after use, close valve by turning to the right until tight, disconnect lines and replace protection bonnet before returning to supplier. Do not use cylinders for any other purpose. Only Snowden Enterprises, Inc. is authorized to refill cylinders. After cylinder is empty and the valves are closed and uncoupled from the system, return cylinder to a secure location properly labeled for Category 1 Pesticides. Return empty and/or partial cylinders only after consulting Snowden Enterprises, Inc., for proper shipping instructions.

**Spill and Leak Procedures** – Evacuate immediate area of spill or leak. Use a NIOSH/MSHA approved self-contained breathing apparatus (SCBA) or combination air supplied/SCBA respirator for entry into affected area to correct problem. Move leaking or damaged cylinders outdoors or to an isolated location, observing strict safety precautions. Work upwind if possible. Allow spill to evaporate. Do not permit entry into spill area by unprotected persons until concentration of sulfur dioxide is determined to be less than 2.0 ppm as determined by use of a direct detection device.

#### **CONDITIONS OF SALE**

1. Snowden Enterprises, Inc. warrants that this product consists of the ingredients specified and is reasonably fit for the purpose stated on this label when used in accordance with the directions under normal conditions of use. No one other than an officer of Snowden is authorized (and such authorization must be in writing) to make any other warranty, guarantee or direction concerning this product.
2. Because the time, place, rate of application, weather conditions and normal or abnormal conditions of use or storage are beyond Snowden's control, to the extent consistent with applicable law, Snowden's liability is limited to replacement of product or refund of purchase price. In no event shall Snowden be liable for indirect or consequential damages.



## [Small Cylinder Base Label]

### RESTRICTED USE PESTICIDE

Due to corrosive effects during inhalation and to eyes and skin. For retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's Certifications.

### THE FRUIT DOCTOR

#### COMPRESSED SULFUR DIOXIDE

READ AND UNDERSTAND THE ENTIRE LABEL BEFORE USING THIS PRODUCT.

ACTIVE INGREDIENT: Sulfur Dioxide.....100%

### KEEP OUT OF REACH OF CHILDREN

**DANGER**



**PELIGRO**

**POISON**

PRECAUCION AL USUARIO: Si usted no lee ingles, no use este producto hasta que la etiqueta le haya sido explicado ampliamente.

HARMFUL IF SWALLOWED. DO NOT SWALLOW OR INHALE.

See inside label booklet for additional  
Precautionary Statements and Directions for Use  
including Storage and Disposal instructions.

EPA REG. No. 11195-1

EPA EST. No. 11195-CA-1 or 2

Manufactured for:

**Snowden Enterprises, Inc.**, P.O. Box 751, Fresno,  
California 93712

**Net Contents:** (See Attached Tag for Pounds Sulfur  
Dioxide Net Contents)

### FIRST AID

**If inhaled:** Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Trained personnel should administer oxygen as soon as possible. Seek medical attention immediately. Call a poison control center or doctor for further treatment advice. **If on skin or clothing:** Immediately flush contaminated skin with copious amounts of running water for at least 15 minutes. Continue as required to control burning sensation. Remove contaminated clothing while in shower to ensure irrigation of all contaminated skin. DO NOT apply any chemicals or ointments/lotions to damaged skin. Seek medical attention immediately. Call a poison control center or doctor for treatment advice. **If in eyes:** DO NOT wear contact lenses when working with or around sulfur dioxide. Hold eye open and rinse slowly and gently with water for 15-20 minutes. Completely flush all eye and lid tissue. DO NOT apply any chemical or ointment to the eyes. Seek medical attention immediately. Call a poison control center or doctor for treatment advice. **If swallowed:** LIQUID SULFUR DIOXIDE) Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting. Do not give anything to an unconscious person. **HOT LINE NUMBER:** Have the product container or label with you when calling a poison control center or doctor, or going for treatment. In the event of a medical emergency, you may also contact the National Pesticide Information Center (NPIC) at 1-800-858-7378. **NOTE TO PHYSICIAN:** Probable mucosal damage may contraindicate the use of gastric lavage.

### PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

#### DANGER - PELIGRO

PRESSURIZED LIQUID GAS – HAZARDOUS VAPOR  
AND LIQUID –

LIQUID CAUSES BURNS OF SKIN AND EYES.

Fatal if inhaled in high concentration. Do not breathe vapor. Persons with a history of respiratory problems should avoid exposure to the product. For handling activities in enclosed areas, use either a supplied-air respirator with NIOSH approval number prefix TC-19C, OR a self-contained breathing apparatus (SCBA) with NIOSH approval number TC-13F. Corrosive. Causes irreversible eye damage. Do not get in eyes or on clothing. Wear a full-face shield. Causes skin burns. Do not get in eyes, on skin, or on clothing. Wear long-sleeved shirt and long pants, and chemical resistant gloves and boots. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.

Sulfur dioxide is an eye, nose, and throat irritant even at low levels. If tearing or upper respiratory tract irritation symptoms occur, leave fumigation area immediately.

Medical assessments of applicators and other persons who will be regularly exposed to sulfur dioxide should be conducted prior to employment and at 1 – 2 year intervals.



## [Large Cylinder Base Label]

### RESTRICTED USE PESTICIDE

Due to corrosive effects during inhalation and to eyes and skin. For retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's Certifications.

#### THE FRUIT DOCTOR

COMPRESSED SULFUR DIOXIDE

READ AND UNDERSTAND THE ENTIRE LABEL BEFORE USING THIS PRODUCT.

ACTIVE INGREDIENT: Sulfur Dioxide..... 100%

#### KEEP OUT OF REACH OF CHILDREN

**DANGER**  **PELIGRO**  
**POISON**

PRECAUCION AL USUARIO: Si usted no lee ingles, no use este producto hasta que la etiqueta le haya sido explicado ampliamente.

HARMFUL IF SWALLOWED. DO NOT SWALLOW OR INHALE.

**See inside label booklet for Additional Precautionary Statements and Directions for Use including Storage and Disposal instructions.**

#### FIRST AID

**If inhaled:** Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Trained personnel should administer oxygen as soon as possible. Seek medical attention immediately. Call a poison control center or doctor for further treatment advice. **If on skin or clothing:** Immediately flush contaminated skin with copious amounts of running water for at least 15 minutes. Continue as required to control burning sensation. Remove contaminated clothing while in shower to ensure irrigation of all contaminated skin. DO NOT apply any chemicals or ointments/lotions to damaged skin. Seek medical attention immediately. Call a poison control center or doctor for treatment advice. **If in eyes:** DO NOT wear contact lenses when working with or around sulfur dioxide. Hold eye open and rinse slowly and gently with water for 15-20 minutes. Completely flush all eye and lid tissue. DO NOT apply any chemical or ointment to the eyes. Seek medical attention immediately. Call a poison control center or doctor for treatment advice. **If swallowed:** LIQUID SULFUR DIOXIDE) Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting. Do not give anything to an unconscious person. **HOT LINE NUMBER:** Have the product container or label with you when calling a poison control center or doctor, or going for treatment. In the event of a medical emergency, you may also contact the National Pesticide Information Center (NPIC) at 1-800-858-7378. **NOTE TO PHYSICIAN:** Probable mucosal damage may contraindicate the use of gastric lavage.

#### PRECAUTIONARY STATEMENTS

##### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

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skin, or on clothing. Wear long-sleeved shirt and long pants, and chemical resistant gloves and boots. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.

Sulfur dioxide is an eye, nose, and throat irritant even at low levels. If tearing or upper respiratory tract irritation symptoms occur, leave fumigation area immediately.

Medical assessments of applicators and other persons who will be regularly exposed to sulfur dioxide should be conducted prior to employment and at 1 – 2 year intervals.

EPA REG. No. 11195-1

EPA EST. No. 11195-CA-1 or 2

Manufactured for: **Snowden Enterprises, Inc.**, P.O. Box 751, Fresno, California 93712

**Net Contents:** (See Attached Tag for Pounds Sulfur Dioxide Net Contents)

[EPA approval date]





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

March 7, 2016

Mr. Michael Kellogg  
Agent for Snowden Enterprises, Inc.  
Snowden Enterprises, Inc.  
c/o Pyxis Regulatory Consulting, Inc.  
4110 136<sup>th</sup> St. Ct. NW  
Gig Harbor, WA 98332

Subject: Label Amendment – Revising large cylinder base language to include first aid language and small cylinder base language to include first aid and precautionary language  
Product Name: The Fruit Doctor/Compressed Sulfur Dioxide  
EPA Registration Number: 11195-1  
Application Date: 02/24/2016  
Decision Number: 514594

Dear Mr. Kellogg:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.



Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact Lisa Pahl by phone at (703) 347-0459, or via email at [pahl.lisa@epa.gov](mailto:pahl.lisa@epa.gov).

Sincerely,

A handwritten signature in cursive script that reads "Heather Garvie".

Heather Garvie, Product Manager 24  
Fungicide and Herbicide  
Registration Division (7505P)  
Office of Pesticide Programs

Enclosure

**Explore Registrations**

Reg Number: 11195-1      Reg. Type: Product Registration - Section 3      Status: Conditionally Registered (17-Jul-199)

Name: THE FRUIT DOCTOR/COMPRESSED SULFUR DIOXIDE      <View Registration Details>

(No New Receipts)

S:	Submission Type	OPP Rec'd Date	Resubmission	Description
<div> <div> ...Decisions... <div> D: Pending; 514594; 11195-1,300,LABEL REVISION;I 75-Day Letters S: 981906 2/26/2016; Amendment: 11195 D: Closed; 508113; 11195-1,300,LABEL REVISION;N D: Closed; 471800; 11195-1,332,NOTIFICATION; D: Closed; 421602; 11195-1,360,ACTION INITIATED D: Closed; 391277; 11195-1,300,LABEL REVISION;N D: Pending; 386248; 11195-1,676,Product Reregistrati D: Closed; 347801; 11195-1,300,LABEL REVISION;N D: Closed; 347728; 11195-1,W01,ULTRA SMALL BUS D: Closed; 347005; 11195-1,V12,FEE REDUCTION (1 D: Closed; 290220; 11195-1,R17,NEW USE EACH AL D: Closed; 290219; 11195-1,350,GENERAL CORRES D: Pending; 290218; 11195-1,320,DATA REQUIRED,L D: Closed; 290217; 11195-1,160,NEW REGISTRATIC Data Requirements </div> </div> <div> S: 981906      Reg #: 11195-1 Submission Type: Amendment Resubmission?: <input type="radio"/> Yes <input checked="" type="radio"/> No      E-Sub #: Decision #: 514594; 300,LABEL REVISION,NO DATA REQUIRED; Submitter Company: SNOWDEN ENTERPRISES, INC Application Date: 24-Feb-2016 OPP Received Date: 26-Feb-2016      Date Sent to Risk manager: 29-Feb-2016 Studies Included?: <input type="radio"/> Yes <input checked="" type="radio"/> No      Fast Track?: <input checked="" type="radio"/> Yes <input type="radio"/> No Form A Signed?: <input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> None      Date: Form B Signed?: <input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> None      Date: Reviewer: Pahel, Lisa Received DT:      Editable Due DT: Submission Due DT: 26-May-2016      Response: 0, 26-Feb-2016 Priority Weight:      Priority Points: Comments: FTA / revise the large cylinder base label to include first aid language and revise the small cylinder base label to include first aid and precautionary statements language (3/2/16 et) </div> </div>				

Decision letter sent 3/7

S: 981906

Miles Email:

Regulatory Type: Product Registration - Section 3

Resubmission: ☐ Yes ☒ No

Application Type: Amendment

Fee For Service: ☐ Yes ☒ No

Billable: ☐ Yes ☒ No

Company: 11195 SNOWDEN ENTERPRISES, INC

V

Risk Manager: Registration Division, Risk Management Team 20

Product #: 11195-1 Product Name: THE FRUIT DOCTOR/COMPRESSED SULFUR

Override#:

Me Too  
Section3:

Me Too Product  
Name:

Application Date: 24-Feb-2016



OPP Rec'd Date: 26-Feb-2016



Front End Date: 26-Feb-2016



Risk Manager Send Date: 29-Feb-2016



FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐

New Ingredient: ☐

Receipt Description:

Non-Pria Fast track label Amendment.

New Ingredient

Request Date:

New Ingredient

Received Date:

Form A: ☐

Signature Date:

Form B: ☐

Signature Date:

Print Letter

Enter More Information

Tracking

Receipt Content

Paper Label

Electronic Label

View/Edit





United States  
Environmental Protection Agency  
Washington, DC 20460

☐ Registration  
☒ Amendment  
☐ Other

OPP Identifier Number

**Application for Pesticide - Section I**

1. Company/Product Number 11195-1	2. EPA Product Manager H. Garvie	3. Proposed Classification <input type="checkbox"/> None <input checked="" type="checkbox"/> Restricted
4. Company/Product (Name) Snowden Enterprises, Inc./The Fruit Doctor/Compressed Sulfur Dioxide	PM# 24	
5. Name and Address of Applicant (Include ZIP Code) Snowden Enterprises, Inc. c/o Pyxis Regulatory Consulting, Inc. 4110 136th St. Ct. NW Gig Harbor, WA 98332 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

**Section - II**

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input checked="" type="checkbox"/> Resubmission in response to Agency letter dated 1/8/2016	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

**Explanation:** Use additional page(s) if necessary. (For section I and Section II.)

Submission of a non-PRIA fast track label amendment in response to Agency correspondence of January 8, 2016. As no data are being submitted with this amendment, nor will data need to be reviewed to approve the proposed labeling, Snowden Enterprises, Inc. believes this action qualifies as a Fast Track amendment and is not subject to a Pesticide Registration Service Fee. Please feel free to contact me by phone (253) 853-7369 or by email at Mike@PyxisRC.com if you have any questions or need any additional information.

**Section - III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal	
* Certification must be submitted				<input type="checkbox"/> Plastic	
If "Yes" Unit Packaging wgt.		No. per container		<input type="checkbox"/> Glass	
If "Yes" Package wgt		No. per container		<input type="checkbox"/> Paper	Gas cylinder
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input checked="" type="checkbox"/> Container		4. Size(s) Retail Container 0.5-150 lbs.		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

**Section - IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Michael Kellogg		Title Agent	
		Telephone No. (Include Area Code) (253)-853-7369	
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received  (Stamped)
2. Signature 		3. Title Agent	
4. Typed Name Michael Kellogg		5. Date 2/24/16	

**PYXIS REGULATORY CONSULTING, INC.**

4110 136<sup>th</sup> St. Ct. NW  
Gig Harbor, WA 98332

Phone: 253-853-7369  
Fax: 253-853-5516  
Mike@PyxisRC.com

February 24, 2016

**COURIER DELIVERY**

Heather Garvie (PM 24)  
Document Processing Desk (**AMEND**)  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202-4501

RE: Snowden Enterprises, Inc. – The Fruit Doctor/Compressed Sulfur Dioxide  
(EPA Reg. No. 11195-1)  
Submission of a Non-PRIA Fast Track Label Amendment in Response to Agency  
Correspondence of January 8, 2016

Dear Ms. Garvie,

On behalf of Snowden Enterprises, Inc., and in response to your email of January 8, 2016 please find the enclosed label amendment to The Fruit Doctor/Compressed Sulfur Dioxide (EPA Reg. No. 11195-1) label.

The following changes are being made to the label:

- 1) Revised the large cylinder base label to include First Aid language
- 2) Revised the small cylinder base label to include First Aid and Precautionary Statements language

In support of this label amendment, please find the enclosed documents:

1. Completed Application for Registration (EPA Form 8570-1)
2. One (1) copy of The Fruit Doctor/Compressed Sulfur Dioxide labeling with changes tracked
3. Three (3) copies of The Fruit Doctor/Compressed Sulfur Dioxide labeling with changes incorporated
4. Certification with Respect to Label Integrity
5. One (1) copy of The Fruit Doctor/Compressed Sulfur Dioxide labeling on CD
6. Letter of Authorization

Snowden Enterprises, Inc. believes this amendment application qualifies as a non-PRIA fast track amendment as no data are being submitted nor will data need to be reviewed to approve the proposed label. Please feel free to contact me by email (Mike@PyxisRC.com) or by phone at (253) 853-7369 if you have any questions or need any additional information.

Sincerely,



Michael Kellogg

Enclosures

cc: K. Shermer; Snowden Enterprises, Inc.



# RESTRICTED USE PESTICIDE

Due to corrosive effects during inhalation and to eyes and skin.

For retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's Certifications.

**ACCEPTED**

03/07/2016

Under the Federal Insecticide, Fungicide  
and Rodenticide Act as amended for the  
pesticide registered under

EPA Reg. No. 11195-1

## THE FRUIT DOCTOR

COMPRESSED SULFUR DIOXIDE

READ AND UNDERSTAND THE

ENTIRE LABEL BEFORE USING THIS PRODUCT.

ACTIVE INGREDIENT: Sulfur Dioxide..... 100%

**KEEP OUT OF REACH OF CHILDREN**

**DANGER**



**PELIGRO**

**POISON**

PRECAUCION AL USUARIO: Si usted no lee ingles, no use este producto hasta que la etiqueta le haya sido explicado ampliamente.

**HARMFUL IF SWALLOWED. DO NOT SWALLOW OR INHALE.**

See inside label booklet for additional Precautionary Statements and Directions for Use including Storage and Disposal instructions.

### FIRST AID

<b>If inhaled</b>	<ul style="list-style-type: none"><li>– Move person to fresh air.</li><li>– If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Trained personnel should administer oxygen as soon as possible.</li><li>– Seek medical attention immediately.</li><li>– Call a poison control center or doctor for further treatment advice.</li></ul>
<b>If on skin or clothing:</b>	<ul style="list-style-type: none"><li>– Immediately flush contaminated skin with copious amounts of running water for at least 15 minutes. Continue as required to control burning sensation. Remove contaminated clothing while in shower to ensure irrigation of all contaminated skin.</li><li>– DO NOT apply any chemicals or ointments/lotions to damaged skin.</li><li>– Seek medical attention immediately. Call a poison control center or doctor for treatment advice.</li></ul>
<b>If in eyes:</b>	<ul style="list-style-type: none"><li>– DO NOT wear contact lenses when working with or around sulfur dioxide.</li><li>– Hold eye open and rinse slowly and gently with water for 15-20 minutes. Completely flush all eye and lid tissue.</li><li>– DO NOT apply any chemical or ointment to the eyes.</li><li>– Seek medical attention immediately. Call a poison control center or doctor for treatment advice.</li></ul>
<b>If swallowed:</b>	<ul style="list-style-type: none"><li>– (LIQUID SULFUR DIOXIDE)</li><li>– Call a poison control center or doctor immediately for treatment advice.</li><li>– Have person sip a glass of water if able to swallow.</li><li>– Do not induce vomiting.</li><li>– Do not give anything to an unconscious person.</li></ul>

### HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. In the event of a medical emergency, you may also contact the National Pesticide Information Center (NPIC) at 1-800-858-7378.

**NOTE TO PHYSICIAN:** Probable mucosal damage may contraindicate the use of gastric lavage.

EPA REG. No. 11195-1

EPA EST. No. 11195-CA-1 or 2

Manufactured for: **Snowden Enterprises, Inc.**, P.O. Box 751, Fresno, California 93712

Net Contents: (See Attached Tag for Pounds Sulfur Dioxide Net Contents)



**PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS AND DOMESTIC ANIMALS  
DANGER - PELIGRO**

**PRESSURIZED LIQUID GAS – HAZARDOUS VAPOR AND LIQUID –  
LIQUID CAUSES BURNS OF SKIN AND EYES.**

Fatal if inhaled in high concentration. Do not breathe vapor. Persons with a history of respiratory problems should avoid exposure to the product. For handling activities in enclosed areas, use either a supplied-air respirator with NIOSH approval number prefix TC-19C, OR a self-contained breathing apparatus (SCBA) with NIOSH approval number TC-13F. Corrosive. Causes irreversible eye damage. Do not get in eyes or on clothing. Wear a full-face shield. Causes skin burns. Do not get in eyes, on skin, or on clothing. Wear long-sleeved shirt and long pants, and chemical resistant gloves and boots. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.

Sulfur dioxide is an eye, nose, and throat irritant even at low levels. If tearing or upper respiratory tract irritation symptoms occur, leave fumigation area immediately.

Medical assessments of applicators and other persons who will be regularly exposed to sulfur dioxide should be conducted prior to employment and at 1 – 2 year intervals.

**PERSONAL PROTECTIVE EQUIPMENT**

**Protective Clothing**

Wear long-sleeved shirt and long pants, gloves and boots when handling this product. Until braided hoses are in place and connections have all been checked, wear a full-face mask when making gas applications.

If using non-braided hosing, wear full-body protective clothing impervious to sulfur dioxide, and gloves and boots that are impervious to sulfur dioxide. Wear goggles and SO<sub>2</sub> NIOSH/MSHA approved respirator when making SO<sub>2</sub> gas applications. Contact lenses should not be worn.

**Respiratory Protection**

If the concentration of sulfur dioxide in the worker area, as measured by a pump and appropriate detector tubes, does not exceed 2.0 ppm, no respiratory protection is required. Examples of detectors are Draeger handpump and appropriate detector tube, Kitagawa or Sensidyne syringe type samplers with appropriate detector. The manufacturer's instructions provided with the measuring device should always be followed for the detector's correct use.

If the 2.0 ppm concentration is exceeded at any time, all persons working in the fumigation area must wear a NIOSH/MSHA approved self-contained breathing apparatus (SCBA) or combination air supplied SCBA respirator. No one should enter a high SO<sub>2</sub>

concentration area using a short-term full-face respirator because these only have a limited capacity for protection. It is not possible for someone working in a high SO<sub>2</sub> concentration area to know when the limit of a full-face respirator has been reached.

#### **ENVIRONMENTAL HAZARDS**

This product is toxic to fish and wildlife. Do not spill or empty into streams, ponds or any other body of water. Do not contaminate water or wetlands by cleaning of equipment, disposal of wastes, or direct application.

#### **PHYSICAL AND CHEMICAL HAZARDS**

Sulfur dioxide is a non-flammable, whitish colored gas of pungent odor. Corrosive in presence of water. Do not spray water on any leaking container. Water will make product corrosive and may increase venting. Sulfur dioxide can be sensed by taste at low level concentrations.

## **DIRECTIONS FOR USE RESTRICTED USE PESTICIDE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

This fumigant is a hazardous material and must be used only by individuals trained in its proper use. Before using, you must read and obey all label restrictions and directions.

All persons working with this fumigant must be knowledgeable about the hazards, and trained in the use of required respirator equipment and detector devices, emergency procedures, and proper use of the fumigant.

When used for fumigation of enclosed spaces (e.g., warehouses, cold storage rooms, trucks, van, boxcars, and other transport vehicles), it is important to follow requirements for applying Category I materials. It is Snowden Enterprises' recommendation that two persons trained in the use of this product be present at all times during introduction of the fumigant through the aeration period. It is recommended that any time SO<sub>2</sub> gassing is occurring, that the area be monitored for SO<sub>2</sub> levels at all times.

### POSTING OF FUMIGATION SITES

Before fumigation, the applicator must post markings at all entrances to the fumigated areas with signs bearing the following statements in English and Spanish:

1. The signal word DANGER/PELIGRO in 2" letters and the skull and crossbones symbol.
2. The statement, "Area under fumigation, DO NOT ENTER/NO ENTRE.
3. The date and time of fumigation.
4. Name of fumigant used.
5. Name, address, and telephone number of the applicator.

Any person who transfers a treated commodity to another site without aeration must ensure that the new site is posted until the air around the commodity is below the threshold concentration (2.0 ppm).

Remove posted marking sign(s) when the concentration of sulfur dioxide in the treated site is below 2.0 ppm as determined by use of a direct detection device.

### RE-ENTRY AFTER FUMIGATION

After fumigation, treated areas must be undisturbed until the level of sulfur dioxide is at or below 2.0 ppm as determined by use of a direct detection device (such as Draeger hand pump and appropriate detector tube or Kitagawa or Sensidyne syringe detection device or an equivalent device). Do not allow entry into the treated area by any person before this



time unless provided with a respiratory protection device (SCBA or combination air-supplied/SCBA respirator).

### COMMODITY FUMIGATION DIRECTIONS

Follow all safety procedures specified on this label.

This product may be applied to the commodity in enclosed stationary spaces (fumigation, pre-cooling, or cold storage rooms). Applications may be made to the commodity in the following transport vehicles: trucks, vans, trailers, and railcars.

#### **Use Restrictions**

- Do not apply/aerate in a manner to allow drift onto areas occupied by unprotected humans or beneficial animals. Do not release fumigant into occupied work area.
- Do not apply so that liquid sulfur dioxide will come in contact with the fruit. Liquid sulfur dioxide on the fruit will cause bleaching of grapes. Enough fans should be operating in the fumigation space to volatilize all of the liquid sulfur dioxide and provide a uniform concentration throughout the room. It is recommended that an air volume of at least 0.5 times the volume of the fumigated space should be moved by the operating fans during each minute of gassing.

For the application, load the commodity to be fumigated into the treatment space. The lug boxes should be oriented such that the openings in each box are aligned with openings in the other boxes to promote airflow through the fruit in the boxes. Pallets of fruit should be stacked to promote airflow between them. Turn on circulating fans, close all vents, exhaust ports, and vents into the space. Vaporize the liquid sulfur dioxide by releasing the liquid  $\text{SO}_2$  into the house hose system used for  $\text{SO}_2$ . The hoses should be ducted into open spaces where air movement is unrestricted. If spraying in front of blower or fan equipment, be sure none is splashed onto the equipment or severe corrosion will result.

### **GRAPES**

For post-harvest use only on grapes held in cold storage. To suppress spread of grey mold disease caused by *Botrytis cinerea*. The warehouse operator should work to minimize conditions that promote grey mold such as bruised or crushed berries, excess bunch shatter, etc.

### WAREHOUSE FUMIGATION AND STORAGE

APPLICATION TIMING:  $\text{SO}_2$  fumigation should occur as soon after harvest as is practical. For fruit to be stored for extended periods, initial gassing should occur on the day of harvest and follow on a 7-10 day interval. For fruit being shipped to market soon after harvest,  $\text{SO}_2$  fumigation should be done before shipment, or in transit, if fruit has

been gassed three (3) or fewer times. For fruit gassed in the warehouse more than three times, 12 or more hours should be allowed to elapse before shipment.

Seeded varieties may be fumigated on a 7-10 day interval up to 20 times. Most seedless varieties may be fumigated on a 7-10 day interval up to 15 times, but the Thompson Seedless variety should not be fumigated more than 12 times.

**RATE OF APPLICATION:** It is not a use inconsistent with this label to use less than recommended amounts, but it should be realized that using less than the stated rates may reduce efficacy.

**INITIAL FUMIGATION:** Use  $\frac{3}{4}$  to 1% gas concentration based on measured volume of the cold storage room or fumigation chamber.

**MAINTENANCE FUMIGATION:** Use  $\frac{1}{4}$  to  $\frac{1}{2}$ % gas concentration based on measured volume of the cold storage room or fumigation chamber.

**TREATMENT TIME:** Gas treatment should last for 20-30 minutes starting when gas is initially introduced into the room. Fumigation should be terminated by venting the room or scrubbing the recirculated air. It is essential that venting be started at or before 30 minutes after gassing initiation or excess residue may result. When venting is initiated, vigorous air movement is required to either exhaust the SO<sub>2</sub> through a vent or vents on the roof, or through a water scrubber. Venting or scrubbing must draw all SO<sub>2</sub> saturated air from the spaces between the berries within the following 20-30 minutes. This requires complete air movement and air replacement in the room at the rate of at least 0.1 to 0.3 of the cubic volume of the room per minute for a duration of 20-30 minutes. Measurement of exhaust fan capacity should be periodically checked to maintain this or a greater air movement efficiency. If a water scrubber system is used, it is essential that sufficient scrubbing surface is available to remove the SO<sub>2</sub> from the recirculating air to equal the rate of removal by direct venting.

#### **APPLICATION – COLD STORAGE ROOM OR FUMIGATION CHAMBER:**

Obtain from Snowden Enterprises, Inc., or a designated distributor a pre-weighed filled cylinder that has been filled for a predesignated measured room (the filling weight is based on the room size).

Connect the bottle to a gassing system that has been previously evaluated and accepted by the chemical manufacturer for the designated room. When everything is ready for fumigation, open the valve and leave it open until the cylinder is empty. Close the valve and uncouple the cylinder from the system. Return the cylinder to a secure location properly labeled for Category 1 Pesticides. Return empty and/or partial cylinders only after consulting Snowden Enterprises, Inc., for proper shipping instructions.



## HIGH FREQUENCY – LOW DOSAGE TREATMENT - WAREHOUSE

**APPLICATION TIMING:** SO<sub>2</sub> fumigation should occur as soon after harvest as is practical. For fruit to be stored for extended periods, initial gassing should occur on the day of harvest and follow at a three times per week interval (2 days, 2 days, 3 days). Seedless and seeded varieties may be fumigated on this high frequency, low dosage basis as long as they are in storage.

**INITIAL FUMIGATION:** Use  $\frac{3}{4}$  to 1% gas concentration based on the measured volume of the cold storage room.

**MAINTENANCE FUMIGATION:** Use 200 to 400 ppm gas concentration based on the measured volume of the cold storage room.

**TREATMENT TIME:** Gas treatment will last until the room concentration is determined by measurement to be below 2.0 ppm. Vigorous air movement is required during gassing and for approximately 30 minutes following gas introduction. No venting is required with this procedure.

**APPLICATION COLD STORAGE ROOM:** Obtain from Snowden Enterprises, Inc., or a designated distributor a pre-weighed, filled cylinder that has been filled for a predesignated measured room (the filling weight is based on the room size). Connect the cylinder to a previously validated gassing system installed in a designated room. When everything is ready for fumigation, open the valve and leave it open until the cylinder is empty. Close the valve and uncouple the cylinder from the system. Return the cylinder to a secure location properly labeled for Category 1 Pesticides. Return empty and/or partial cylinders only after consulting Snowden Enterprises, Inc., for proper shipping instructions.

**IN-HOUSE FOLLOW-UP PROCEDURE:** If you use this method, it is a requirement of this gassing method to examine your fruit for mold growth for the duration of cold storage. Fruit examination should occur at least once weekly.

## FUMIGATION OF GRAPES IN TRANSPORTATION VEHICLES (REFRIGERATOR TRUCKS, REFRIGERATED CONTAINERS, AND REFRIGERATED RAILCARS)

Use Restrictions:

- Transportation vehicles fumigated with sulfur dioxide must be held for 24 hours and sulfur dioxide concentrations must be below 2 ppm before releasing for shipment.
- Ensure truck is on a level surface to prevent back flow of liquid sulfur dioxide through the floor drain.



#### REFRIGERATED TRUCKS & CONTAINERS – FULL LOAD

1. Attach 2 ft. poly-flo plastic to right or left pallet stringer. Use only Snowden provided plastic staples or Arrow T-25M Stapler with 9/16" staples. Hose MUST BE SECURE. Additional staples may be required.
2. Insert brass receptacle on rubber hose into end of poly-flo plastic securely.
3. Insert knurled end of hose down floor drain. Close doors.
4. Connect knurled end of hose finger tight to cylinder.
5. Turn cylinder upside down. Open slowly. Discharge completely (approximately 1 – 2 minutes).
6. When empty, close stem. Disconnect hose. Pull hose straight down from drain hole, releasing it from poly-flo plastic for reuse.

#### REFRIGERATED TRUCKS & CONTAINERS – PARTIAL LOAD

1. Close doors. Insert pipe up through drain hole.
2. Connect knurled end of hose finger tight to cylinder.
3. Turn cylinder upside down. Open slowly. Discharge completely (approximately 1 – 2 minutes).
4. When empty, close stem. Remove pipe from drain hole for reuse.

#### REFRIGERATED RAILCAR

1. Insert pipe into door opening at floor level. Close doors leaving hose outside.
2. Connect knurled end of hose finger tight to cylinder.
3. Turn cylinder upside down. Open slowly. Discharge completely (approximately 1 – 2 minutes).
4. When empty, close stem. Disconnect.
5. Remove pipe from doors.

FOR USE IN CLEANING BARRELS USED IN WINE PRODUCTION – Fumigate barrels to minimize effects of non-public health fungi and/or bacteria prior to the introduction of grape juice for wine production.

For wooden barrels used for wine aging:

1. Inside of barrels should be rinsed by a solvent selected by the winery (e.g. soap, water, etc.) and air dried.
2. Gas barrels - Using Gas Cylinder only (no eduction tube) and a barrel gassing unit with a pressure gauge provided by Snowden Enterprises. Pressure in the cylinder should be between 18-45 psi. Begin treatment by removing bung from barrel, insert SO<sub>2</sub> probe into the barrel and open the valve for 2-3 seconds. Now close the valve, extract the SO<sub>2</sub> probe and replace bung. Insert the SO<sub>2</sub> probe into the next barrel following the same procedure until all barrels are treated OR the pressure in the cylinder falls below 18 psi. If the cylinder pressure falls below 18 psi, change to another Gas Cylinder and continue gassing process as described.

NOTE TO USER: If a liquid SO<sub>2</sub> cylinder (with education tube) is used, the barrel will be damaged.

The SO<sub>2</sub> cylinders have fusible plugs (heat sensitive plugs) rated at 165°F. Do not expose cylinders to a heat source, including hot water. Doing so may rapidly release all of the SO<sub>2</sub> from the tank. If this happens, the work area should be evacuated until the air in the work area is shown to contain 2 ppm or less SO<sub>2</sub> or proper breathing apparatus is used.

After treatment, set cleaned barrels aside for 1-30 days. If barrels were gassed more than 30 days previously, they need to be re-gassed. When the barrels are being gassed, Draeger tube, or similar device readings must occasionally be made during gassing process to assure that the SO<sub>2</sub> concentration in the gassing or work area does not exceed 2 ppm. If the work area readings are above 2 ppm, workers in the area must use NIOSH approved fitted face respirators for a short time or leave the work area until the atmosphere is shown to be at or below 2 ppm by an SO<sub>2</sub> detection device.

## FUMIGATING CORKS USED IN WINE PRODUCTION

For corks used in wine production: Fumigate the cork to reduce effects of non-public health fungal or bacterial growth prior to corking bottles to minimize contamination of the wine in the bottle.

To fumigate cork bags, use a Gas Cylinder only (no education tube) and cork bag gassing unit equipped with or without a vacuum sealer. The Gas Cylinder and pressure gauge are provided by Snowden Enterprises or a designated distributor. Pressure in the cylinder should be between 18-45 psi. Begin treatment by placing a plastic bag into the cork loading equipment, fill the bag with corks, begin the heat sealing process, introduce SO<sub>2</sub> gas for 2-3 seconds, and complete the heat sealing process. If the cylinder pressure falls below 18 psi, change to another Gas Cylinder and continue the gassing process. Fumigated corks may be used the day following SO<sub>2</sub> gassing. Any bags thus treated must be labeled as "SO<sub>2</sub> treated".

## STORAGE AND DISPOSAL, SPILL AND LEAK PROCEDURES

### **STORAGE AND DISPOSAL**

Do not contaminate water, food, or feed by storage or disposal.

**Pesticide Storage** – Store in a secure location properly labeled for Category I pesticides. Store cylinders upright, secured to a rack or wall or placed in specially designed cases to prevent tipping. Cylinders should not be subjected to rough handling or mechanical shock such as dropping, bumping, dragging, or sliding. Do not use rope slings, hooks, tongs, or similar devices to unload cylinders. Do not store near flammable material, near the inlet of a ventilating or air conditioning unit, near any source of direct heat, nor in a subsurface location. Before use, locate the bottle labeled for the room to be fumigated, which will show the room number and weight of SO<sub>2</sub> in the container, move this container to the room matched to the container for fumigation. Do not remove bonnet or safety cap protecting valve before use. Replace bonnet or safety cap when not in use.

**Pesticide Disposal** – Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of according to label instruction, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

**Container Handling** - Refillable container. Refill this container with sulfur dioxide only. Do not reuse this container for any other purpose. When cylinder is empty after use, close valve by turning to the right until tight, disconnect lines and replace protection bonnet before returning to supplier. Do not use cylinders for any other purpose. Only Snowden Enterprises, Inc. is authorized to refill cylinders. After cylinder is empty and the valves are closed and uncoupled from the system, return cylinder to a secure location properly labeled for Category 1 Pesticides. Return empty and/or partial cylinders only after consulting Snowden Enterprises, Inc., for proper shipping instructions.



**Spill and Leak Procedures** – Evacuate immediate area of spill or leak. Use a NIOSH/MSHA approved self-contained breathing apparatus (SCBA) or combination air supplied/SCBA respirator for entry into affected area to correct problem. Move leaking or damaged cylinders outdoors or to an isolated location, observing strict safety precautions. Work upwind if possible. Allow spill to evaporate. Do not permit entry into spill area by unprotected persons until concentration of sulfur dioxide is determined to be less than 2.0 ppm as determined by use of a direct detection device.

#### **CONDITIONS OF SALE**

1. Snowden Enterprises, Inc. warrants that this product consists of the ingredients specified and is reasonably fit for the purpose stated on this label when used in accordance with the directions under normal conditions of use. No one other than an officer of Snowden is authorized (and such authorization must be in writing) to make any other warranty, guarantee or direction concerning this product.
2. Because the time, place, rate of application, weather conditions and normal or abnormal conditions of use or storage are beyond Snowden's control, to the extent consistent with applicable law, Snowden's liability is limited to replacement of product or refund of purchase price. In no event shall Snowden be liable for indirect or consequential damages.

## [Small Cylinder Base Label]

### RESTRICTED USE PESTICIDE

Due to corrosive effects during inhalation and to eyes and skin. For retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's Certifications.

### THE FRUIT DOCTOR

#### COMPRESSED SULFUR DIOXIDE

READ AND UNDERSTAND THE ENTIRE LABEL BEFORE USING THIS PRODUCT.

ACTIVE INGREDIENT: Sulfur Dioxide.....100%

### KEEP OUT OF REACH OF CHILDREN



**DANGER**

**PELIGRO**

**POISON**

PRECAUCION AL USUARIO: Si usted no lee ingles, no use este producto hasta que la etiqueta le haya sido explicado ampliamente.

HARMFUL IF SWALLOWED. DO NOT SWALLOW OR INHALE.

See inside label booklet for additional Precautionary Statements and Directions for Use including Storage and Disposal instructions.

EPA REG. No. 11195-1

EPA EST. No. 11195-CA-1 or 2

Manufactured for:

Snowden Enterprises, Inc., P.O. Box 751, Fresno, California 93712

Net Contents: (See Attached Tag for Pounds Sulfur Dioxide Net Contents)

### FIRST AID

If inhaled: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Trained personnel should administer oxygen as soon as possible. Seek medical attention immediately. Call a poison control center or doctor for further treatment advice. If on skin or clothing: Immediately flush contaminated skin with copious amounts of running water for at least 15 minutes. Continue as required to control burning sensation. Remove contaminated clothing while in shower to ensure irrigation of all contaminated skin. DO NOT apply any chemicals or ointments/lotions to damaged skin. Seek medical attention immediately. Call a poison control center or doctor for treatment advice. If in eyes: DO NOT wear contact lenses when working with or around sulfur dioxide. Hold eye open and rinse slowly and gently with water for 15-20 minutes. Completely flush all eye and lid tissue. DO NOT apply any chemical or ointment to the eyes. Seek medical attention immediately. Call a poison control center or doctor for treatment advice. If swallowed: LIQUID SULFUR DIOXIDE) Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting. Do not give anything to an unconscious person. HOT LINE NUMBER: Have the product container or label with you when calling a poison control center or doctor, or going for treatment. In the event of a medical emergency, you may also contact the National Pesticide Information Center (NPIC) at 1-800-858-7378. NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

### PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

#### DANGER - PELIGRO

PRESSURIZED LIQUID GAS – HAZARDOUS VAPOR  
AND LIQUID –  
LIQUID CAUSES BURNS OF SKIN AND EYES.

Fatal if inhaled in high concentration. Do not breathe vapor. Persons with a history of respiratory problems should avoid exposure to the product. For handling activities in enclosed areas, use either a supplied-air respirator with NIOSH approval number prefix TC-19C, OR a self-contained breathing apparatus (SCBA) with NIOSH approval number TC-13F. Corrosive. Causes irreversible eye damage. Do not get in eyes or on clothing. Wear a full-face shield. Causes skin burns. Do not get in eyes, on skin, or on clothing. Wear long-sleeved shirt and long pants, and chemical resistant gloves and boots. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.

Sulfur dioxide is an eye, nose, and throat irritant even at low levels. If tearing or upper respiratory tract irritation symptoms occur, leave fumigation area immediately.

Medical assessments of applicators and other persons who will be regularly exposed to sulfur dioxide should be conducted prior to employment and at 1 – 2 year intervals.



## [Large Cylinder Base Label]

### RESTRICTED USE PESTICIDE

Due to corrosive effects during inhalation and to eyes and skin. For retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's Certifications.

#### THE FRUIT DOCTOR

COMPRESSED SULFUR DIOXIDE

READ AND UNDERSTAND THE ENTIRE LABEL BEFORE USING THIS PRODUCT.

ACTIVE INGREDIENT: Sulfur Dioxide..... 100%

#### KEEP OUT OF REACH OF CHILDREN

**DANGER**  **PELIGRO**  
**POISON**

PRECAUCION AL USUARIO: Si usted no lee ingles, no use este producto hasta que la etiqueta le haya sido explicado ampliamente.

HARMFUL IF SWALLOWED. DO NOT SWALLOW OR INHALE.

**See inside label booklet for Additional Precautionary Statements and Directions for Use including Storage and Disposal instructions.**

#### FIRST AID

**If inhaled:** Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Trained personnel should administer oxygen as soon as possible. Seek medical attention immediately. Call a poison control center or doctor for further treatment advice. **If on skin or clothing:** Immediately flush contaminated skin with copious amounts of running water for at least 15 minutes. Continue as required to control burning sensation. Remove contaminated clothing while in shower to ensure irrigation of all contaminated skin. DO NOT apply any chemicals or ointments/lotions to damaged skin. Seek medical attention immediately. Call a poison control center or doctor for treatment advice. **If in eyes:** DO NOT wear contact lenses when working with or around sulfur dioxide. Hold eye open and rinse slowly and gently with water for 15-20 minutes. Completely flush all eye and lid tissue. DO NOT apply any chemical or ointment to the eyes. Seek medical attention immediately. Call a poison control center or doctor for treatment advice. **If swallowed:** LIQUID SULFUR DIOXIDE) Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting. Do not give anything to an unconscious person. **HOT LINE NUMBER:** Have the product container or label with you when calling a poison control center or doctor, or going for treatment. In the event of a medical emergency, you may also contact the National Pesticide Information Center (NPIC) at 1-800-858-7378. **NOTE TO PHYSICIAN:** Probable mucosal damage may contraindicate the use of gastric lavage.

#### PRECAUTIONARY STATEMENTS

##### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

PRESSURIZED LIQUID GAS – HAZARDOUS VAPOR AND LIQUID –  
LIQUID CAUSES BURNS OF SKIN AND EYES.

Fatal if inhaled in high concentration. Do not breathe vapor. Persons with a history of respiratory problems should avoid exposure to the product. For handling activities in enclosed areas, use either a supplied-air respirator with NIOSH approval number prefix TC-19C, OR a self-contained breathing apparatus (SCBA) with NIOSH approval number TC-13F. Corrosive. Causes irreversible eye damage. Do not get in eyes or on clothing. Wear a full-face shield. Causes skin burns. Do not get in eyes, on



skin, or on clothing. Wear long-sleeved shirt and long pants, and chemical resistant gloves and boots. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.

EPA REG. No. 11195-1

EPA EST. No. 11195-CA-1 or 2

Manufactured for: **Snowden Enterprises, Inc.**, P.O. Box 751, Fresno, California 93712

**Net Contents:** (See Attached Tag for Pounds Sulfur Dioxide Net Contents)

[EPA approval date]



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

October 21, 2015

Mr. Michael Kellogg  
Agent for Snowden Enterprises, Inc.  
Snowden Enterprises, Inc.  
c/o Pyxis Regulatory Consulting, Inc.  
4110 136<sup>th</sup> St. NW  
Gig Harbor, WA 98332

Subject: Label Amendment – clarification of use directions; reformatting of label  
Product Name: The Fruit Doctor/Compressed Sulfur Dioxide  
EPA Registration Number: 11195-1  
Application Date: 8/6/2015  
Decision Number: 508113

Dear Mr. Kellogg:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance

**Pahel, Lisa**

---

**From:** Garvie, Heather  
**Sent:** Thursday, September 03, 2015 7:35 AM  
**To:** Mike Kellogg; Pahel, Lisa  
**Subject:** RE: Amendment for 11195-1

Hi Mike:

Thanks for your email. You are correct – sulfur dioxide is being grouped with sodium metabisulfite. The error was on my part.

Thanks,  
Heather

**From:** Mike Kellogg [mailto:Mike@PyxisRC.com]  
**Sent:** Wednesday, September 02, 2015 4:08 PM  
**To:** Pahel, Lisa  
**Cc:** Garvie, Heather  
**Subject:** RE: Amendment for 11195-1

Lisa,

I've attached both a tracked changes and clean version of the label for EPA Reg. No. 11195-1.

However, it is our understanding that Sulfur Dioxide is grouped in with sodium metabisulfite (not sulfur) [FWP attached] and there has been no preliminary decision. Therefore, I did not include the changes you had requested from the Sulfur interim registration review decision. I have incorporated your other changes.

Should you have any questions or require any additional changes, please do not hesitate to contact me.

Regards,  
Mike Kellogg  
Pyxis Regulatory Consulting, Inc.  
4110 136<sup>th</sup> St. NW  
Gig Harbor, WA 98332  
T: 253-853-7369  
F: 253-853-5516

**From:** Pahel, Lisa [mailto:Pahel.Lisa@epa.gov]  
**Sent:** Tuesday, September 01, 2015 11:45 AM  
**To:** Mike Kellogg  
**Cc:** Garvie, Heather  
**Subject:** Amendment for 11195-1

Hi Mike,

Sulfur Dioxide is currently undergoing registration review. Since you have submitted a label amendment for Reg No. 11195-1, we need you to incorporate the label changes outlined on page 31 of the attached document. I am happy to help you incorporate the changes, so please let me know if you have questions or concerns.



There were also a few other revisions I would like you to make to the label to bring it into compliance with Label Review Manual updates since 11195-1's last label review.

Please see the copy of the label I have attached with my comments. Again, feel free to contact me with any questions or for clarification.

Best,  
Lisa

Lisa Pahel  
Environmental Protection Specialist  
Fungicide and Herbicide Branch  
Registration Division  
Office of Pesticide Programs  
703-347-0459



Reg Number: 11195-1

Reg. Type: Product Registration - Section 3

Status: Conditionally Registered (17-Jul-199)

Name: THE FRUIT DOCTOR/COMPRESSED SULFUR DIOXIDE

<View Registration Details>

(No New Receipts)				
S:	Submission Type	OPP Rec'd Date	Resubmission	Description

Decisions...

75-Day Letters

S: 972342 8/10/2015; Amendment; 11195

D: Closed; 471800; 11195-1;332;NOTIFICATION;

D: Closed; 421602; 11195-1;360;ACTION INITIATED

D: Closed; 391277; 11195-1;300;LABEL REVISION;N

D: Pending; 386248; 11195-1;676;Product Reregistrati

D: Closed; 347801; 11195-1;300;LABEL REVISION;N

D: Closed; 347728; 11195-1;W01;ULTRA SMALL BUS

D: Closed; 347005; 11195-1;V12;FEE REDUCTION (1

D: Closed; 290220; 11195-1;R17;NEW USE,EACH AL

D: Closed; 290219; 11195-1;350;GENERAL CORRES

D: Pending; 290218; 11195-1;320;DATA REQUIRED;L

D: Closed; 290217; 11195-1;160;NEW REGISTRATIC

Data Requirements

S: 972342    Reg #: 11195-1

Submission Type: Amendment

Resubmission?: ☐ Yes ☒ No    E-Sub #:

Decision #: 508113; 300;LABEL REVISION;NO DATA REQUIRED;

Submitter Company: SNOWDEN ENTERPRISES, INC

Application Date: 06-Aug-2015

OPP Received Date: 10-Aug-2015    Date Sent to Risk manager: 12-Aug-2015

Studies Included?: ☐ Yes ☒ No    Fast Track?: ☒ Yes ☐ No

Form A Signed?: ☐ Yes ☐ No ☒ None    Date:

Form B Signed?: ☐ Yes ☐ No ☒ None    Date:

Reviewer: Pahel, Lisa

Received DT:    Editable Due DT:

Submission Due DT: 08-Nov-2015    Response: 0 , 10-Aug-2015

Priority Weight:    Priority Points:

Comments: FTA / label changes

AUG 25 2015 *ret*



S: 672342  
Landscape

Regulatory Type: Product Registration - Section 3

Resubmission: ☐ Yes ☒ No

Application Type: Amendment

Fee For Service: ☐ Yes ☒ No

Billable: ☐ Yes ☒ No

Company: 11195 SHOWDEN ENTERPRISES, INC



Print Letter

Enter More Information

Tracking

Risk Manager: Registration Division, Risk Management Team 20

Product #: 11195-1 Product Name: THE FRUIT DOCTOR/COMPRESSED SULFUR [

Override#:

Me Too Section3: Me Too Product Name:

Application Date: 06-Aug-2015 OPP Rec'd Date: 10-Aug-2015

Front End Date: 10-Aug-2015 Risk Manager Send Date: 12-Aug-2015

FFS Due Date: Negotiated Due Date:

OPP Target Date:

Fast Track: ☐ New Ingredient: ☐

Receipt Description:

AMENDMENT

New Ingredient Request Date:

New Ingredient Received Date:

Form A: ☐ Signature Date:

Form B: ☐ Signature Date:

Receipt Content	De:
Paper Label	
Electronic Label	

View/Edit





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

August 12, 2015

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

JANELLE KAY  
PYXIS REGULATORY CONSULTING, INC.  
SNOWDEN ENTERPRISES, INC  
4110 136TH ST. NW  
GIG HARBOR, WA 98332-

PRODUCT NAME: THE FRUIT DOCTOR/COMPRESSED SULFUR DIOXIDE  
COMPANY NAME: SNOWDEN ENTERPRISES, INC  
OPP IDENTIFICATION NUMBER:  
EPA FILE SYMBOL: 11195-1  
EPA RECEIPT DATE: 08/10/15

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 20, at (703) 308-3194.

Sincerely,

A handwritten signature in blue ink, consisting of a stylized, cursive "S" followed by a horizontal line and a small flourish.

Front End Processing Staff  
Information Services Branch  
Information Technology & Resources Management Division



United States  
Environmental Protection Agency  
Washington, DC 20460

☐ Registration  
☒ Amendment  
☐ Other

OPP Identifier Number

## Application for Pesticide - Section I

1. Company/Product Number 11195-1	2. EPA Product Manager S. Joyner	3. Proposed Classification <input type="checkbox"/> None <input checked="" type="checkbox"/> Restricted
4. Company/Product (Name) Snowden Enterprises, Inc./The Fruit Doctor/Compressed Sulfur Dioxide	PM# 20	
5. Name and Address of Applicant (Include ZIP Code) Snowden Enterprises, Inc. c/o Pyxis Regulatory Consulting, Inc. 4110 136th St. NW Gig Harbor, WA 98332 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

## Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of a non-PRIA fast track label amendment making changes as listed on accompanying cover letter. As no data are being submitted with this amendment, nor will data need to be reviewed to approve the proposed labeling, Snowden Enterprises, Inc. believes this action qualifies as a Fast Track amendment and is not subject to a Pesticide Registration Service Fee. Please feel free to contact me by phone (253) 853-7369 or by email at Mike@PyxisRC.com if you have any questions or need any additional information.

## Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal	
				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	Gas cylinder
* Certification must be submitted					
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input checked="" type="checkbox"/> Container		4. Size(s) Retail Container 0.5-150 lbs.		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

## Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Michael Kellogg		Title Agent	
		Telephone No. (Include Area Code) (253)-853-7333	
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received  <b>(Stamped)</b>
2. Signature 		3. Title Agent	
4. Typed Name Michael Kellogg		5. Date 8/6/95	



**PYXIS REGULATORY CONSULTING, INC.**

4110 136<sup>th</sup> St. NW  
Gig Harbor, WA 98332

Phone: 253-853-7369  
Fax: 253-853-5516  
Mike@PyxisRC.com

August 6, 2015

**COURIER DELIVERY**

Shaja Joyner (PM 20)  
Document Processing Desk (**AMEND**)  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202-4501

RE: Snowden Enterprises, Inc. – The Fruit Doctor/Compressed Sulfur Dioxide  
(EPA Reg. No. 11195-1)  
Submission of a Non-PRIA Fast Track Label Amendment

Dear Ms. Joyner,

On behalf of Snowden Enterprises, Inc., please find the enclosed label amendment to The Fruit Doctor/Compressed Sulfur Dioxide (EPA Reg. No. 11195-1) label.

The following changes are being made to the label:

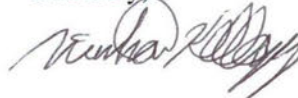
- 1) Reformatted the Master label which previously contained a Label and Application Manual into a single cohesive label
- 2) Clarified the directions for use for truck and railcar fumigation providing more detailed instructions to the applicators

In support of this label amendment, please find the enclosed documents:

1. Completed Application for Registration (EPA Form 8570-1)
2. One (1) copy of The Fruit Doctor/Compressed Sulfur Dioxide labeling with changes tracked
3. Three (3) copies of The Fruit Doctor/Compressed Sulfur Dioxide labeling with changes incorporated
4. Certification with Respect to Label Integrity
5. One (1) copy of The Fruit Doctor/Compressed Sulfur Dioxide labeling on CD
6. Letter of Authorization

Snowden Enterprises, Inc. believes this amendment application qualifies as a non-PRIA fast track amendment as no data are being submitted nor will data need to be reviewed to approve the proposed label and no new uses are being added to the label. Please feel free to contact me by email (Mike@PyxisRC.com) or by phone at (253) 853-7369 if you have any questions or need any additional information.

Sincerely,



Michael Kellogg

Enclosures

cc: K. Shermer; Snowden Enterprises, Inc.



# *Snowden* ENTERPRISES Inc.

---

MAIN OFFICE:  
P.O. BOX 751, FRESNO, CALIFORNIA 93712-0751  
PHONE (559) 237-5546, FAX (559) 237-6383

MODESTO OFFICE:  
P.O. BOX 3309, MODESTO, CALIFORNIA 95353-3309  
PHONE (209) 522-5215, FAX (209) 522-4136

October 15, 2012

To Whom It May Concern:

RE: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Pyxis Regulatory Consulting, Inc. is authorized to act as agents for Snowden Enterprises, Inc. (EPA Company Number 11195), before the U.S. Environmental Protection Agency and state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

If you have any questions, please do not hesitate to contact me.

Sincerely,



Kirk Shermer  
President

Cc: Pyxis Regulatory Consulting, Inc.

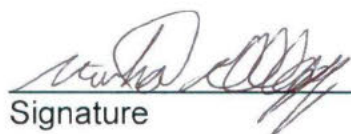
# Certification with Respect to Label Integrity

version: 9/11/02

I certify that the information (including, but not limited to, text, tables, and graphics) contained in the electronic file identified below by file name and submitted with this certification is the same information as that on the paper copies of these documents included with this submission.

PROPOSED LABEL		
EPA Registration #	Date Submitted to EPA	Electronic file name
11195-1	August 6, 2015	011195-00001.20150806.The Fruit Doctor label .PDF

I certify that the statements that I have made on this form are true, accurate, and complete. I acknowledge that any knowingly false or misleading statements may be punishable by fine or imprisonment or both under applicable law.

  
Signature

  
Date

Michael Kellogg

Name (typed)

Agent

Title

## RESTRICTED USE PESTICIDE

Due to corrosive effects during inhalation and to eyes and skin.

For retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's Certifications.

**ACCEPTED**

10/21/2015

Under the Federal Insecticide, Fungicide  
and Rodenticide Act as amended, for the  
pesticide registered under  
EPA Reg. No. 11195-1

## THE FRUIT DOCTOR

COMPRESSED SULFUR DIOXIDE  
READ AND UNDERSTAND THE  
ENTIRE LABEL BEFORE USING THIS PRODUCT.

ACTIVE INGREDIENT: Sulfur Dioxide..... 100%

KEEP OUT OF REACH OF CHILDREN

**DANGER**



**PELIGRO**

**POISON**

PRECAUCION AL USUARIO: Si usted no lee ingles, no use este producto hasta que la etiqueta le haya sido explicado ampliamente.

**HARMFUL IF SWALLOWED. DO NOT SWALLOW OR INHALE.**

See inside label booklet for additional Precautionary Statements and Directions for Use including Storage and Disposal instructions.

### FIRST AID

<b>If inhaled</b>	<ul style="list-style-type: none"><li>– Move person to fresh air.</li><li>– If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Trained personnel should administer oxygen as soon as possible.</li><li>– Seek medical attention immediately.</li><li>– Call a poison control center or doctor for further treatment advice.</li></ul>
<b>If on skin or clothing:</b>	<ul style="list-style-type: none"><li>– Immediately flush contaminated skin with copious amounts of running water for at least 15 minutes. Continue as required to control burning sensation. Remove contaminated clothing while in shower to ensure irrigation of all contaminated skin.</li><li>– DO NOT apply any chemicals or ointments/lotions to damaged skin.</li><li>– Seek medical attention immediately. Call a poison control center or doctor for treatment advice.</li></ul>
<b>If in eyes:</b>	<ul style="list-style-type: none"><li>– DO NOT wear contact lenses when working with or around sulfur dioxide.</li><li>– Hold eye open and rinse slowly and gently with water for 15-20 minutes. Completely flush all eye and lid tissue.</li><li>– DO NOT apply any chemical or ointment to the eyes.</li><li>– Seek medical attention immediately. Call a poison control center or doctor for treatment advice.</li></ul>
<b>If swallowed:</b>	<ul style="list-style-type: none"><li>– (LIQUID SULFUR DIOXIDE)</li><li>– Call a poison control center or doctor immediately for treatment advice.</li><li>– Have person sip a glass of water if able to swallow.</li><li>– Do not induce vomiting.</li><li>– Do not give anything to an unconscious person.</li></ul>

### HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. In the event of a medical emergency, you may also contact the National Pesticide Information Center (NPIC) at 1-800-858-7378.

**NOTE TO PHYSICIAN:** Probable mucosal damage may contraindicate the use of gastric lavage.

EPA REG. No. 11195-1

EPA EST. No. 11195-CA-1 or 2

Manufactured for: **Snowden Enterprises, Inc.**, P.O. Box 751, Fresno, California 93712

Net Contents: (See Attached Tag for Pounds Sulfur Dioxide Net Contents)



**PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS AND DOMESTIC ANIMALS  
DANGER - PELIGRO**

**PRESSURIZED LIQUID GAS – HAZARDOUS VAPOR AND LIQUID –  
LIQUID CAUSES BURNS OF SKIN AND EYES.**

Fatal if inhaled in high concentration. Do not breathe vapor. Persons with a history of respiratory problems should avoid exposure to the product. For handling activities in enclosed areas, use either a supplied-air respirator with NIOSH approval number prefix TC-19C, OR a self-contained breathing apparatus (SCBA) with NIOSH approval number TC-13F. Corrosive. Causes irreversible eye damage. Do not get in eyes or on clothing. Wear a full-face shield. Causes skin burns. Do not get in eyes, on skin, or on clothing. Wear long-sleeved shirt and long pants, and chemical resistant gloves and boots. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.

Sulfur dioxide is an eye, nose, and throat irritant even at low levels. If tearing or upper respiratory tract irritation symptoms occur, leave fumigation area immediately.

Medical assessments of applicators and other persons who will be regularly exposed to sulfur dioxide should be conducted prior to employment and at 1 – 2 year intervals.

**PERSONAL PROTECTIVE EQUIPMENT**

**Protective Clothing**

Wear long-sleeved shirt and long pants, gloves and boots when handling this product. Until braided hoses are in place and connections have all been checked, wear a full-face mask when making gas applications.

If using non-braided hosing, wear full-body protective clothing impervious to sulfur dioxide, and gloves and boots that are impervious to sulfur dioxide. Wear goggles and SO<sub>2</sub> NIOSH/MSHA approved respirator when making SO<sub>2</sub> gas applications. Contact lenses should not be worn.

**Respiratory Protection**

If the concentration of sulfur dioxide in the worker area, as measured by a pump and appropriate detector tubes, does not exceed 2.0 ppm, no respiratory protection is required. Examples of detectors are Draeger handpump and appropriate detector tube, Kitagawa or Sensidyne syringe type samplers with appropriate detector. The manufacturer's instructions provided with the measuring device should always be followed for the detector's correct use.

If the 2.0 ppm concentration is exceeded at any time, all persons working in the fumigation area must wear a NIOSH/MSHA approved self-contained breathing apparatus (SCBA) or combination air supplied SCBA respirator. No one should enter a high SO<sub>2</sub>

concentration area using a short-term full-face respirator because these only have a limited capacity for protection. It is not possible for someone working in a high SO<sub>2</sub> concentration area to know when the limit of a full-face respirator has been reached.

#### **ENVIRONMENTAL HAZARDS**

This product is toxic to fish and wildlife. Do not spill or empty into streams, ponds or any other body of water. Do not contaminate water or wetlands by cleaning of equipment, disposal of wastes, or direct application.

#### **PHYSICAL AND CHEMICAL HAZARDS**

Sulfur dioxide is a non-flammable, whitish colored gas of pungent odor. Corrosive in presence of water. Do not spray water on any leaking container. Water will make product corrosive and may increase venting. Sulfur dioxide can be sensed by taste at low level concentrations.

## **DIRECTIONS FOR USE RESTRICTED USE PESTICIDE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

This fumigant is a hazardous material and must be used only by individuals trained in its proper use. Before using, you must read and obey all label restrictions and directions.

All persons working with this fumigant must be knowledgeable about the hazards, and trained in the use of required respirator equipment and detector devices, emergency procedures, and proper use of the fumigant.

When used for fumigation of enclosed spaces (e.g., warehouses, cold storage rooms, trucks, van, boxcars, and other transport vehicles), it is important to follow requirements for applying Category I materials. It is Snowden Enterprises' recommendation that two persons trained in the use of this product be present at all times during introduction of the fumigant through the aeration period. It is recommended that any time SO<sub>2</sub> gassing is occurring, that the area be monitored for SO<sub>2</sub> levels at all times.

### POSTING OF FUMIGATION SITES

Before fumigation, the applicator must post markings at all entrances to the fumigated areas with signs bearing the following statements in English and Spanish:

1. The signal word DANGER/PELIGRO in 2" letters and the skull and crossbones symbol.
2. The statement, "Area under fumigation, DO NOT ENTER/NO ENTRE.
3. The date and time of fumigation.
4. Name of fumigant used.
5. Name, address, and telephone number of the applicator.

Any person who transfers a treated commodity to another site without aeration must ensure that the new site is posted until the air around the commodity is below the threshold concentration (2.0 ppm).

Remove posted marking sign(s) when the concentration of sulfur dioxide in the treated site is below 2.0 ppm as determined by use of a direct detection device.

### RE-ENTRY AFTER FUMIGATION

After fumigation, treated areas must be undisturbed until the level of sulfur dioxide is at or below 2.0 ppm as determined by use of a direct detection device (such as Draeger hand pump and appropriate detector tube or Kitagawa or Sensidyne syringe detection device or an equivalent device). Do not allow entry into the treated area by any person before this



time unless provided with a respiratory protection device (SCBA or combination air-supplied/SCBA respirator).

## COMMODITY FUMIGATION DIRECTIONS

Follow all safety procedures specified on this label.

This product may be applied to the commodity in enclosed stationary spaces (fumigation, pre-cooling, or cold storage rooms). Applications may be made to the commodity in the following transport vehicles: trucks, vans, trailers, and railcars.

### **Use Restrictions**

- Do not apply/aerate in a manner to allow drift onto areas occupied by unprotected humans or beneficial animals. Do not release fumigant into occupied work area.
- Do not apply so that liquid sulfur dioxide will come in contact with the fruit. Liquid sulfur dioxide on the fruit will cause bleaching of grapes. Enough fans should be operating in the fumigation space to volatilize all of the liquid sulfur dioxide and provide a uniform concentration throughout the room. It is recommended that an air volume of at least 0.5 times the volume of the fumigated space should be moved by the operating fans during each minute of gassing.

For the application, load the commodity to be fumigated into the treatment space. The lug boxes should be oriented such that the openings in each box are aligned with openings in the other boxes to promote airflow through the fruit in the boxes. Pallets of fruit should be stacked to promote airflow between them. Turn on circulating fans, close all vents, exhaust ports, and vents into the space. Vaporize the liquid sulfur dioxide by releasing the liquid SO<sub>2</sub> into the house hose system used for SO<sub>2</sub>. The hoses should be ducted into open spaces where air movement is unrestricted. If spraying in front of blower or fan equipment, be sure none is splashed onto the equipment or severe corrosion will result.

### **GRAPES**

For post-harvest use only on grapes held in cold storage. To suppress spread of grey mold disease caused by *Botrytis cinerea*. The warehouse operator should work to minimize conditions that promote grey mold such as bruised or crushed berries, excess bunch shatter, etc.

## WAREHOUSE FUMIGATION AND STORAGE

**APPLICATION TIMING:** SO<sub>2</sub> fumigation should occur as soon after harvest as is practical. For fruit to be stored for extended periods, initial gassing should occur on the day of harvest and follow on a 7-10 day interval. For fruit being shipped to market soon after harvest, SO<sub>2</sub> fumigation should be done before shipment, or in transit, if fruit has

been gassed three (3) or fewer times. For fruit gassed in the warehouse more than three times, 12 or more hours should be allowed to elapse before shipment.

Seeded varieties may be fumigated on a 7-10 day interval up to 20 times. Most seedless varieties may be fumigated on a 7-10 day interval up to 15 times, but the Thompson Seedless variety should not be fumigated more than 12 times.

**RATE OF APPLICATION:** It is not a use inconsistent with this label to use less than recommended amounts, but it should be realized that using less than the stated rates may reduce efficacy.

**INITIAL FUMIGATION:** Use  $\frac{3}{4}$  to 1% gas concentration based on measured volume of the cold storage room or fumigation chamber.

**MAINTENANCE FUMIGATION:** Use  $\frac{1}{4}$  to  $\frac{1}{2}$ % gas concentration based on measured volume of the cold storage room or fumigation chamber.

**TREATMENT TIME:** Gas treatment should last for 20-30 minutes starting when gas is initially introduced into the room. Fumigation should be terminated by venting the room or scrubbing the recirculated air. It is essential that venting be started at or before 30 minutes after gassing initiation or excess residue may result. When venting is initiated, vigorous air movement is required to either exhaust the SO<sub>2</sub> through a vent or vents on the roof, or through a water scrubber. Venting or scrubbing must draw all SO<sub>2</sub> saturated air from the spaces between the berries within the following 20-30 minutes. This requires complete air movement and air replacement in the room at the rate of at least 0.1 to 0.3 of the cubic volume of the room per minute for a duration of 20-30 minutes. Measurement of exhaust fan capacity should be periodically checked to maintain this or a greater air movement efficiency. If a water scrubber system is used, it is essential that sufficient scrubbing surface is available to remove the SO<sub>2</sub> from the recirculating air to equal the rate of removal by direct venting.

**APPLICATION – COLD STORAGE ROOM OR FUMIGATION CHAMBER:**

Obtain from Snowden Enterprises, Inc., or a designated distributor a pre-weighed filled cylinder that has been filled for a predesignated measured room (the filling weight is based on the room size).

Connect the bottle to a gassing system that has been previously evaluated and accepted by the chemical manufacturer for the designated room. When everything is ready for fumigation, open the valve and leave it open until the cylinder is empty. Close the valve and uncouple the cylinder from the system. Return the cylinder to a secure location properly labeled for Category I Pesticides. Return empty and/or partial cylinders only after consulting Snowden Enterprises, Inc., for proper shipping instructions.

## HIGH FREQUENCY – LOW DOSAGE TREATMENT - WAREHOUSE

**APPLICATION TIMING:** SO<sub>2</sub> fumigation should occur as soon after harvest as is practical. For fruit to be stored for extended periods, initial gassing should occur on the day of harvest and follow at a three times per week interval (2 days, 2 days, 3 days). Seedless and seeded varieties may be fumigated on this high frequency, low dosage basis as long as they are in storage.

**INITIAL FUMIGATION:** Use ¾ to 1% gas concentration based on the measured volume of the cold storage room.

**MAINTENANCE FUMIGATION:** Use 200 to 400 ppm gas concentration based on the measured volume of the cold storage room.

**TREATMENT TIME:** Gas treatment will last until the room concentration is determined by measurement to be below 2.0 ppm. Vigorous air movement is required during gassing and for approximately 30 minutes following gas introduction. No venting is required with this procedure.

**APPLICATION COLD STORAGE ROOM:** Obtain from Snowden Enterprises, Inc., or a designated distributor a pre-weighed, filled cylinder that has been filled for a predesignated measured room (the filling weight is based on the room size). Connect the cylinder to a previously validated gassing system installed in a designated room. When everything is ready for fumigation, open the valve and leave it open until the cylinder is empty. Close the valve and uncouple the cylinder from the system. Return the cylinder to a secure location properly labeled for Category 1 Pesticides. Return empty and/or partial cylinders only after consulting Snowden Enterprises, Inc., for proper shipping instructions.

**IN-HOUSE FOLLOW-UP PROCEDURE:** If you use this method, it is a requirement of this gassing method to examine your fruit for mold growth for the duration of cold storage. Fruit examination should occur at least once weekly.

## FUMIGATION OF GRAPES IN TRANSPORTATION VEHICLES (REFRIGERATOR TRUCKS, REFRIGERATED CONTAINERS, AND REFRIGERATED RAILCARS)

### Use Restrictions:

- Transportation vehicles fumigated with sulfur dioxide must be held for 24 hours and sulfur dioxide concentrations must be below 2 ppm before releasing for shipment.
- Ensure truck is on a level surface to prevent back flow of liquid sulfur dioxide through the floor drain.



#### REFRIGERATED TRUCKS & CONTAINERS – FULL LOAD

1. Attach 2 ft. poly-flo plastic to right or left pallet stringer. Use only Snowden provided plastic staples or Arrow T-25M Stapler with 9/16" staples. Hose MUST BE SECURE. Additional staples may be required.
2. Insert brass receptacle on rubber hose into end of poly-flo plastic securely.
3. Insert knurled end of hose down floor drain. Close doors.
4. Connect knurled end of hose finger tight to cylinder.
5. Turn cylinder upside down. Open slowly. Discharge completely (approximately 1 – 2 minutes).
6. When empty, close stem. Disconnect hose. Pull hose straight down from drain hole, releasing it from poly-flo plastic for reuse.

#### REFRIGERATED TRUCKS & CONTAINERS – PARTIAL LOAD

1. Close doors. Insert pipe up through drain hole.
2. Connect knurled end of hose finger tight to cylinder.
3. Turn cylinder upside down. Open slowly. Discharge completely (approximately 1 – 2 minutes).
4. When empty, close stem. Remove pipe from drain hole for reuse.

#### REFRIGERATED RAILCAR

1. Insert pipe into door opening at floor level. Close doors leaving hose outside.
2. Connect knurled end of hose finger tight to cylinder.
3. Turn cylinder upside down. Open slowly. Discharge completely (approximately 1 – 2 minutes).
4. When empty, close stem. Disconnect.
5. Remove pipe from doors.

FOR USE IN CLEANING BARRELS USED IN WINE PRODUCTION – Fumigate barrels to minimize effects of non-public health fungi and/or bacteria prior to the introduction of grape juice for wine production.

For wooden barrels used for wine aging:

1. Inside of barrels should be rinsed by a solvent selected by the winery (e.g. soap, water, etc.) and air dried.
2. Gas barrels - Using Gas Cylinder only (no reduction tube) and a barrel gassing unit with a pressure gauge provided by Snowden Enterprises. Pressure in the cylinder should be between 18-45 psi. Begin treatment by removing bung from barrel, insert SO<sub>2</sub> probe into the barrel and open the valve for 2-3 seconds. Now close the valve, extract the SO<sub>2</sub> probe and replace bung. Insert the SO<sub>2</sub> probe into the next barrel following the same procedure until all barrels are treated OR the pressure in the cylinder falls below 18 psi. If the cylinder pressure falls below 18 psi, change to another Gas Cylinder and continue gassing process as described.

NOTE TO USER: If a liquid SO<sub>2</sub> cylinder (with education tube) is used, the barrel will be damaged.

The SO<sub>2</sub> cylinders have fusible plugs (heat sensitive plugs) rated at 165°F. Do not expose cylinders to a heat source, including hot water. Doing so may rapidly release all of the SO<sub>2</sub> from the tank. If this happens, the work area should be evacuated until the air in the work area is shown to contain 2 ppm or less SO<sub>2</sub> or proper breathing apparatus is used.

After treatment, set cleaned barrels aside for 1-30 days. If barrels were gassed more than 30 days previously, they need to be re-gassed. When the barrels are being gassed, Draeger tube, or similar device readings must occasionally be made during gassing process to assure that the SO<sub>2</sub> concentration in the gassing or work area does not exceed 2 ppm. If the work area readings are above 2 ppm, workers in the area must use NIOSH approved fitted face respirators for a short time or leave the work area until the atmosphere is shown to be at or below 2 ppm by an SO<sub>2</sub> detection device.

## FUMIGATING CORKS USED IN WINE PRODUCTION

For corks used in wine production: Fumigate the cork to reduce effects of non-public health fungal or bacterial growth prior to corking bottles to minimize contamination of the wine in the bottle.

To fumigate cork bags, use a Gas Cylinder only (no eduction tube) and cork bag gassing unit equipped with or without a vacuum sealer. The Gas Cylinder and pressure gauge are provided by Snowden Enterprises or a designated distributor. Pressure in the cylinder should be between 18-45 psi. Begin treatment by placing a plastic bag into the cork loading equipment, fill the bag with corks, begin the heat sealing process, introduce SO<sub>2</sub> gas for 2-3 seconds, and complete the heat sealing process. If the cylinder pressure falls below 18 psi, change to another Gas Cylinder and continue the gassing process. Fumigated corks may be used the day following SO<sub>2</sub> gassing. Any bags thus treated must be labeled as "SO<sub>2</sub> treated".

## STORAGE AND DISPOSAL, SPILL AND LEAK PROCEDURES

### **STORAGE AND DISPOSAL**

Do not contaminate water, food, or feed by storage or disposal.

**Pesticide Storage** – Store in a secure location properly labeled for Category I pesticides. Store cylinders upright, secured to a rack or wall or placed in specially designed cases to prevent tipping. Cylinders should not be subjected to rough handling or mechanical shock such as dropping, bumping, dragging, or sliding. Do not use rope slings, hooks, tongs, or similar devices to unload cylinders. Do not store near flammable material, near the inlet of a ventilating or air conditioning unit, near any source of direct heat, nor in a subsurface location. Before use, locate the bottle labeled for the room to be fumigated, which will show the room number and weight of SO<sub>2</sub> in the container, move this container to the room matched to the container for fumigation. Do not remove bonnet or safety cap protecting valve before use. Replace bonnet or safety cap when not in use.

**Pesticide Disposal** – Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of according to label instruction, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

**Container Handling** - Refillable container. Refill this container with sulfur dioxide only. Do not reuse this container for any other purpose. When cylinder is empty after use, close valve by turning to the right until tight, disconnect lines and replace protection bonnet before returning to supplier. Do not use cylinders for any other purpose. Only Snowden Enterprises, Inc. is authorized to refill cylinders. After cylinder is empty and the valves are closed and uncoupled from the system, return cylinder to a secure location properly labeled for Category I Pesticides. Return empty and/or partial cylinders only after consulting Snowden Enterprises, Inc., for proper shipping instructions.



**Spill and Leak Procedures** – Evacuate immediate area of spill or leak. Use a NIOSH/MSHA approved self-contained breathing apparatus (SCBA) or combination air supplied/SCBA respirator for entry into affected area to correct problem. Move leaking or damaged cylinders outdoors or to an isolated location, observing strict safety precautions. Work upwind if possible. Allow spill to evaporate. Do not permit entry into spill area by unprotected persons until concentration of sulfur dioxide is determined to be less than 2.0 ppm as determined by use of a direct detection device.

#### **CONDITIONS OF SALE**

1. Snowden Enterprises, Inc. warrants that this product consists of the ingredients specified and is reasonably fit for the purpose stated on this label when used in accordance with the directions under normal conditions of use. No one other than an officer of Snowden is authorized (and such authorization must be in writing) to make any other warranty, guarantee or direction concerning this product.
2. Because the time, place, rate of application, weather conditions and normal or abnormal conditions of use or storage are beyond Snowden's control, to the extent consistent with applicable law, Snowden's liability is limited to replacement of product or refund of purchase price. In no event shall Snowden be liable for indirect or consequential damages.

## [Small Cylinder Base Label]

### RESTRICTED USE PESTICIDE

Due to corrosive effects during inhalation and to eyes and skin. For retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's Certifications.

### THE FRUIT DOCTOR COMPRESSED SULFUR DIOXIDE

ACTIVE INGREDIENT: Sulfur Dioxide..... 100%

KEEP OUT OF REACH OF CHILDREN

**DANGER**



**PELIGRO**

**POISON**

PRECAUCION AL USUARIO: Si usted no lee ingles, no use este producto hasta que la etiqueta le haya sido explicado ampliamente.

HARMFUL IF SWALLOWED. DO NOT SWALLOW OR INHALE.

**See outer container for complete label.**

EPA REG. No. 11195-1

Manufactured for: **Snowden Enterprises, Inc.**, P.O. Box 751, Fresno, California 93712

Net Contents: (See Attached Tag for Pounds Sulfur Dioxide Net Contents)

EPA EST. No. 11195-CA-1 or 2

[Large Cylinder Base Label]

**RESTRICTED USE PESTICIDE**

Due to corrosive effects during inhalation and to eyes and skin. For retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's Certifications.

**THE FRUIT DOCTOR**  
COMPRESSED SULFUR DIOXIDE

ACTIVE INGREDIENT: Sulfur Dioxide..... 100%

**KEEP OUT OF REACH OF CHILDREN**

**DANGER**  **PELIGRO**  
**POISON**

PRECAUCION AL USUARIO: Si usted no lee ingles, no use este producto hasta que la etiqueta le haya sido explicado ampliamente.

HARMFUL IF SWALLOWED. DO NOT SWALLOW OR INHALE.

See label booklet for First Aid, Additional Precautionary Statements and Directions for Use including Storage and Disposal instructions.

**PRECAUTIONARY STATEMENTS**  
**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

**PRESSURIZED LIQUID GAS – HAZARDOUS VAPOR AND LIQUID –**  
**LIQUID CAUSES BURNS OF SKIN AND EYES.**

Fatal if inhaled in high concentration. Do not breathe vapor. Persons with a history of respiratory problems should avoid exposure to the product. For handling activities in enclosed areas, use either a supplied-air respirator with NIOSH approval number prefix TC-19C, OR a self-contained breathing apparatus (SCBA) with NIOSH approval number TC-13F. Corrosive. Causes irreversible eye damage. Do not get in eyes or on clothing. Wear a full-face shield. Causes skin burns. Do not get in eyes, on skin, or on clothing. Wear long-sleeved shirt and long pants, and chemical resistant gloves and boots. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.

EPA REG. No. 11195-1

EPA EST. No. 11195-CA-1 or 2

Manufactured for: **Snowden Enterprises, Inc.**, P.O. Box 751, Fresno, California 93712

Net Contents: (See Attached Tag for Pounds Sulfur Dioxide Net Contents)

[EPA approval date]



✓

**DATE OUT: 27/AUG/08**

**SUBJECT: PRODUCT CHEMISTRY REVIEW OF: TGAI [ ]; MUP [X]; EUP [x]**

**BARCODE NO.:** 355348

**REG./FILE SYMBOL NO.:** 11195-1

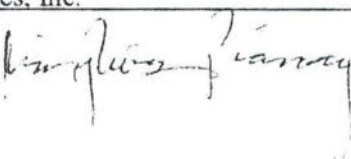
**PRODUCT NAME:** The Fruit Doctor

**MRID NO.:** 474665-01

**COMPANY NAME:** Snowden Enterprises, Inc.

**ACTION CODE:** 674

**FROM:** Maria Rivera Piansay, Chemist  
Product Chemistry Team  
PRB/SRRD (7508P)



**TO:** Karen Jones, CRM  
Product Reregistration Branch  
Special Review and Reregistration Division (7508P)

**INTRODUCTION:**

A Reregistration Eligibility Decision (RED), Case number 4056, was issued in May, 2007 for the Inorganic Sulfites, which include the chemicals sulfur dioxide (SO<sub>2</sub>) and sodium metabisulfite (Na<sub>2</sub>S<sub>2</sub>O<sub>5</sub>). According to the RED, the generic data base supporting the reregistration of the Inorganic Sulfites have been reviewed and found to be substantially complete.

In the 8-month response to the Inorganic Sulfites RED, the registrant provided a basic formulation Confidential Statement of Formula (CSF) dated 6/25/08; draft label, EPA received 7/3/08; and product chemistry data in MRID number 474665-01, to support the reregistration of EPA Reg. No. **11195-1**.

**FINDINGS:**

1. EPA Reg. No. 11195-5 is a manufacturing use/end-use product produced through an integrated process and contains 100% Sulfur Dioxide.
2. The CSF for the basic formulation, dated 6/25/08, was filled out correctly and completely and in compliance with PR Notice 91-2 and 40 CFR 158.175(b)(2) and (c). The CSF is acceptable for reregistration of this product.
3. The product chemistry data presented in MRID number 474665-01 satisfy the requirements as specified in 40 CFR §158.155, 158.160, 158.162, 158.167, 158.170, 158.175, and 158.180 which pertain to Product Identity and Composition, Description of Materials Used to Produce the Product, Description of Production Process, Discussion of Formation of Impurities, Preliminary Analysis, Certified Limits, and Enforcement Analytical Method. The data also satisfy the requirements under 40 CFR §158.190 which pertain to the Physical and Chemical Properties of the product.
- 4a. The Ingredient statement on the label is acceptable as per PR Notice 91-2 and 40 CFR 156.10(g).
- 4b. The Physical and Chemical Hazards statements currently on the label are deemed acceptable as per guidance in the Label Review Manual.
- 4c. The Storage and Disposal statements are acceptable in accordance with 40 CFR 156.10(i)(2)(ix) and PR Notice 83-3. We recommend placing the Storage and Disposal section in a box of solid lines for increased prominence. The recommendation should be addressed during label review.

**CONCLUSIONS :**

The registrant has satisfied the product chemistry data requirements for the reregistration of EPA Reg. No. 11195-1.

**Product Chemistry Data****Group A: Guidelines Series 830.1550 - 830.1800 (40 CFR §158.320 - 158.355)****Product Identity, Composition, and Analysis**

<b>GUIDELINE REFERENCE NO. (GRN)/ TITLE 830</b>	<b>40 CFR §</b>	<b>MRID Number</b>	<b>Data Fulfilled</b>
830.1550 Product Identity and Composition	158.320	474665-01	Y
830.1600 Description of Materials Used to Produce the Product	158.325	474665-01	Y
830.1620 Description of Production Process	158.330	474665-01	Y
830.1650 Description of Formulation Process	158.335		NA
830.1650 Discussion of Formation of Impurities	158.340	474665-01	Y
830.1700 Preliminary Analysis	158.345	474665-01	Y
830.1750 Certified Limits	158.350	474665-01, CSF	Y
*830.1800 Enforcement Analytical Method	158.355	474665-01	Y

**Subgroup B: Series 830.6302 - 7950 (40 CFR §158.310)****Physical and Chemical Properties**

<b>GUIDELINE REFERENCE NO. (GRN)/ TITLE 830</b>	<b>VALUE OR QUALITATIVE DESCRIPTION</b>	<b>MRID number</b>	<b>Data Fulfilled</b>
.6302 Color	Colorless	474665-01	Y
.6303 Physical State	Gas at standard conditions	474665-01	Y
.6304 Odor	"Rotten eggs" (strong)	474665-01	Y



.6314 Stability to Normal and Elevated Temperatures, Metals and Metal Ions	The product is stable. Moist gas corrodes most metals. Reacts with water. Reacts violently with strong alkalis (e.g. sodium hydroxide, fluorine), bromine pentafluorine, chlorine trifluoride, chlorates, powdered metals (e.g. chromium, manganese, aluminum), metal oxides, metal acetylides, sodium hydride, cesium azide, silver azide, and diethyl zinc.	(taken from MSDS)	
.6314 Oxidation/Reduction: Chemical Incompatibility	Strong reducing agent	(based on MSDS and other available data)	Y
.6315 Flammability/Flame Extension	Non-flammable	(MSDS and CSF)	Y
.6316 Explodability	Not applicable as the product has no impact explosive characteristics.		NA
.6317 Storage Stability	Sulfur dioxide is stable. Temperatures above 2000°C are required to bring about detectable decomposition. The pure, anhydrous SO <sub>2</sub> will not decompose under normal conditions of storage.	474665-01	Y
.6319 Miscibility			NA

<p>.6320 Corrosion Characteristics</p>	<p>“SO<sub>2</sub> is released as a gas in a controlled manner and is not corrosive as a gas, unless it comes into contact with moisture. It frequently comes into contact with moisture in the cold storage chambers in which the gas is released at which point sulfurous acid is formed. In addition, combination with oxygen in the atmosphere leads to the formation of sulfuric acid. These chemicals form as a result of their contact with the condensates that occur, particularly on metallic surfaces associated with the cold storage radiators, typically made of aluminum, and occasionally copper. SO<sub>2</sub> is likely to be corrosive of any metal that would be found in a cold storage room on which condensates would occur.</p> <p>On that basis SO<sub>2</sub> gas used in a cold storage facility would be considered as having corrosive characteristics. And if an accident occurred outside of a cold storage facility and the SO<sub>2</sub> gas came into contact with water moisture, it would corrode most metals.”</p> <p>metals.</p>		Y
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.6321 Dielectric Breakdown Voltage	Not used around electrical equipments.		NA
.7000 pH	"Not applicable as a gas"	474665-01	NA
.7050 UV/Visible Absorption	NA		NA
.7100 Viscosity	NA		NA
.7200 Melting Point	-75.55°C (-104°F)	474665-01	Y
.7220 Boiling Point	-9.99°C (14°F)	474665-01	Y
.7300 Density/Relative Density	Specific gravity: 1.45	474665-01	Y
.7370 Dissociation Constant in Water			NA
.7550 Partition Coefficient (n-octanol/water)	NA		NA
.7840 Water Solubility	11.9% by wt. in water at 15°C (60°F) and 760 mmHg. Also soluble in alcohol, chloroform, and acetic acid.	474665-01	
.7950 Vapor Pressure	NA	474665-01	NA

Explanations: Y = Requirement fulfilled; N = Requirement not fulfilled; N/A = Not applicable; G = Data gap; U = Upgradeable; I = Incomplete or in progress; W = Waived

### 830.1800 Enforcement Analytical Method

Assay of the liquid SO<sub>2</sub> includes Determination of Moisture (Karl Fischer method), Determination of Total Residue (SOP 300/002), and Determination of Acidity (SOP 300/003). The method for determining moisture involves dispensing the sample directly into the titration cell containing a dry solution of HPLC grade methanol and allowing the Karl Fischer titrator to titrate the sample. Total residue is determined by evaporating samples and calculating total residue by difference in weights of crucible and sample before and after evaporation. Acidity is determined by drying the sample in an enclosed flask equipped with a drying tube and titrating the residue with standardized sodium hydroxide.

\*Methods for testing the SO<sub>2</sub> gas are available in open literature which includes the Dreager Safety, Inc., Industrial Scientific Corporation, and RAE System. The AOAC wet chemistry method can also be used (Standard Method for Sulfurous Acid Determination by Monier-Williams (AOAC, 47.3.39, P29, 17<sup>th</sup> edition).



Preliminary Analysis of Product Samples (MRID number 474665-01):

**Pages 126-128 \* Claimed confidential by submitter\***

MRID	MRID Status	Citation Reference	Guideline
47962308		Miller, M. (2009) Final Study Report: Virucidal Efficacy of Pre-Saturated Towelettes for Hard Surface Disinfection: (Human Immunodeficiency Virus type 1). Project Number: A08032, LZ01071609/HIV. Unpublished study prepared by ATS Labs. 25 p.	810.2100/Products for use on hard surfaces-basic efficacy data requirements
47962306		Ruhme, J. (2009) Final Study Report: Standard Test Method for Efficacy of Sanitizers Recommended for Inanimate Non-Food Contact Surfaces (Modification for Pre-Saturated Towelette Product Application): (Staphylococcus aureus and Klebsiella pneumoniae). Project Number: A08049, LZ01071609/NFS/1. Unpublished study prepared by ATS Labs. 28 p.	810.2100/Products for use on hard surfaces-basic efficacy data requirements
47962302		Ruhme, J. (2009) Final Study Report: Pre-Saturated Towelettes for Hard Surface Disinfection (Staphylococcus aureus). Project Number: A07788, LZ01012809/TOW. Unpublished study prepared by ATS Labs. 24 p.	810.2100/Products for use on hard surfaces-basic efficacy data requirements
47962309		Gutzmann, K. (2009) Final Study Report: Virucidal Efficacy of Pre-Saturated Towelettes for Hard Surface Disinfection: (Influenza A (H1N1) Virus). Project Number: A08230, LZ01082709/SFLU. Unpublished study prepared by ATS Labs. 25 p.	810.2100/Products for use on hard surfaces-basic efficacy data requirements
47962303		Stemper, A. (2009) Final Study Report: Pre-Saturated Towelettes for Hard Surface Disinfection: (Pseudomonas aeruginosa). Project Number: A08033, LZ01071609/TOW/1. Unpublished study prepared by ATS Labs. 24 p.	810.2100/Products for use on hard surfaces-basic efficacy data requirements
47962304		Stemper, A. (2009) Final Study Report: Pre-Saturated Towelettes for Hard Surface Disinfection: (Salmonella enterica). Project Number: A08034, LZ01071609/TOW/2. Unpublished study prepared by ATS Labs. 24 p.	810.2100/Products for use on hard surfaces-basic efficacy data requirements
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47962305		Jeske, A. (2009) Final Study Report: Pre-Saturated Towelettes for Hard Surface Disinfection: (Escherichia coli). Project Number: A08035, LZ01071609/TOW/3. Unpublished study prepared by ATS Labs. 24 p.	810.2100/Products for use on hard surfaces-basic efficacy data requirements

DP#: (375009)

## \*\*\* Product and Data Package Ingredients \*\*\*

Decision#: (426880)

PC Code	CAS	Ingredient Name
069105	68424-85-1	Alkyl* dimethyl benzyl ammonium chloride *(50%C14, 40%C12, 10%C16)
069149	7173-51-5	1-Decanaminium, N-decyl-N,N-dimethyl-, chloride
069165	32426-11-2	1-Decanaminium, N,N-dimethyl-N-octyl-, chloride
069166	5538-94-3	1-Octanaminium, N,N-dimethyl-N-octyl-, chloride
069165	32426-11-2	1-Decanaminium, N,N-dimethyl-N-octyl-, chloride(.069%)
069166	5538-94-3	1-Octanaminium, N,N-dimethyl-N-octyl-, chloride(.028%)
069149	7173-51-5	1-Decanaminium, N-decyl-N,N-dimethyl-, chloride(.042%)
069105	68424-85-1	Alkyl* dimethyl benzyl ammonium chloride *(50%C14, 40%C12, 10%C16)(.093%)



